EXECUTIVE SUMMARY - ENFORCEMENT MATTER Page 1 of 2 DOCKET NO.: 2010-1527-IWD-E TCEQ ID: RN102535077 CASE NO.: 40405 RESPONDENT NAME: BP Products North America Inc.

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ORDER TYPE:		
1660 AGREED ORDER	X_FINDINGS AGREED ORDER	_FINDINGS ORDER FOLLOWING SOAH HEARING
FINDINGS DEFAULT ORDER	SHUTDOWN ORDER	IMMINENT AND SUBSTANTIAL ENDANGERMENT ORDER
_AMENDED ORDER	EMERGENCY ORDER	
CASE TYPE:		
AIR	MULTI-MEDIA (check all that apply)	INDUSTRIAL AND HAZARDOUS WASTE
PUBLIC WATER SUPPLY	PETROLEUM STORAGE TANKS	_OCCUPATIONAL CERTIFICATION
X WATER QUALITY	SEWAGE SLUDGE	UNDERGROUND INJECTION CONTROL
MUNICIPAL SOLID WASTE	RADIOACTIVE WASTE	DRY CLEANER REGISTRATION
and 25th, Texas City, Galveston County TYPE OF OPERATION: Petroleum results and 25th, Texas City, Galveston County SMALL BUSINESS: Yes X OTHER SIGNIFICANT MATTERS: Tregarding this facility location. INTERESTED PARTIES: No one othe COMMENTS RECEIVED: The Texas R CONTACTS AND MAILING LIST: TCEQ Attorney/SEP Coordit TCEQ Enforcement Coordin 2554; Ms. Laurie Eaves, Enforce Respondent: Mr. Keith Casey, Texas 77592	finery with an associated wastewater treatment _No There are no complaints. There is no record of a r than the ED and the Respondent has expressed Register comment period expired on March 7, 2 mator: None mator: Ms. Lanae Foard, Enforcement Division, ement Division, MC 219, (512) 239-4495 TXC Business Unit Leader, BP Products North represented by counsel on this enforcement materials.	facility dditional pending enforcement actions d an interest in this matter. o11. No comments were received. Enforcement Team 1, MC 169, (512) 239- America Inc., P.O. Box 401, Texas City,

VIOLATION SUMMARY CHART: CORRECTIVE ACTIONS VIOLATION INFORMATION PENALTY CONSIDERATIONS TAKEN/REQUIRED **Corrective Actions Taken:** Total Assessed: \$242,900 Type of Investigation: Complaint X Routine Total Deferred: \$0 The Executive Director recognizes that the Respondent has implemented the Enforcement Follow-up Expedited Settlement X Records Review following corrective measures at the Financial Inability to Pay Facility: Date(s) of Complaints Relating to a. By January 27, 2010, ceased the this Case: None **SEP Conditional Offset: \$0** unauthorized discharge of nonhazardous biosludge into Borrow Date of Investigation Relating to Total Paid to General Revenue: this Case: March 17 and 24, 2010 and Ditch: \$242,900 October 11, 2010 b. By February 18, 2010, ceased the **Compliance History Classifications:** unauthorized discharge of wastewater Date of NOV/NOE Relating to this Person/CN - Average Site/RN - Average Case: June 22, 2010 (NOE) mixed with toluene; c. By February 20, 2010, removed and Background Facts: These were Major Source: X Yes No disposed of the dead fish, collected and routine investigations and a records analyzed samples from the area review. Applicable Penalty Policy: September affected by the February 16, 2010, 2002 discharge, and confirmed that WATER pollutant levels in the hurricane canal Findings Orders Justification: had been reduced to levels protective 1) Failed to prevent the unauthorized of the environment; discharge of a nonpermitted Human health or the environment has wastewater source through Outfall 005 been exposed to pollutants which exceed and failed to comply with permitted d. By March 18, 2010, completed the levels that are protective. removal of the nonhazardous effluent limits for phenolics [TEX. biosludge from Borrow Ditch; WATER CODE § 26.121(a)(1), 30 TEX. ADMIN. CODE § 305.125(1), and Texas e. By March 31, 2010, investigated the Pollutant Discharge Elimination System ("TPDES") Permit No. cause of noncompliance and returned to compliance with all permitted WO0000443000, Effluent Limitations and Monitoring Requirements No. 1]. effluent limits; and f. By October 12, 2010, updated 2) Failed to prevent the unauthorized operational procedures to prevent discharge of industrial waste into or future unauthorized discharges. adjacent to water in the state [Tex. WATER CODE § 26.121(a)(1) and TPDES Permit No. WQ0000443000, Permit Conditions No. 2.g.]. 3) Failed to comply with permitted effluent limits for Outfall Nos. 001, 005 and 006 for fecal coliform, oil and grease and phenolics [TEX. WATER CODE § 26.121(a)(1), 30 TEX. ADMIN. CODE § 305.125(1), and TPDES Permit No. WQ0000443000, Effluent

Additional ID No(s).: WQ0000443000

Limitations and Monitoring Requirements No. 1].

Policy Revision 2 (Se	Penalty Calculation Worksheet (PCW) PCW PCW	Revision October 30, 2008
ICEQ DATES Assigned PCW		A Decke distriction
CASE INFORMATION Enf./Case ID No. Docket No. Media Program(s) Multi-Media Admin. Penalty \$ L	40405 No. of Violations 5 2010-1527-IWD-E Order Type Findings Water Quality Government/Non-Profit No Enf. Coordinator Lanae Foar EC's Team Enforcemen	
TOTAL BASE PENA	Penalty Calculation Section NLTY (Sum of violation base penalties) Subtotal	\$80,000
ADJUSTMENTS (# Subtotals 2-7 are ob Compliance Hi	Enhancement for one NOV with same/similar violations, 15 months of self-reported effluent violations, 62 NOVs with dissimilar violations, 11	7 \$454,400
Culpability Notes		4 \$0
Good Faith Eff	ort to Comply Total Adjustments Subtotal	<i>5</i> \$12,500
Economic Bene Approx.	efit 7 0.0% Enhancement Subtotal Total EB Amounts \$705 Cost of Compliance \$186,753	<i>6</i> \$0
SUM OF SUBTOTAL	ES 1-7	al \$521,900
	AS JUSTICE MAY REQUIRE 0.0% Adjustme	nt \$0
	Final Penalty Amou	
DEFERRAL	D.0% Reduction Adjustine enalty by the indicted percentage. (Enter number only; e.g. 20 for 20% reduction.)	
Notes	No deferral is recommended for Findings Orders	

\$242,900

PAYABLE PENALTY

Screening Date 10-Sep-2010

Docket No. 2010-1527-IWD-E

Policy Revision 2 (September 2002) PCW Revision October 30, 2008

80%

124%

60%

Enter Number Here Adjust.

16

62

3

Respondent BP Products North America Inc.

Case ID No. 40405

Reg. Ent. Reference No. RN102535077

Component Number of...

NOVs

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>>

>>

Media [Statute] Water Quality Enf. Coordinator Lanae Foard

Other written NOVs

Compliance History Worksheet
Compliance History Site Enhancement (Subtotal 2)

Written notices of violation ("NOVs") with same or similar violations as those in

Any agreed final enforcement orders containing a denial of liability (number of

the current enforcement action (number of NOVs meeting criteria)

	orders meeting criteria)	3	60%
Orders	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	1.1	275%
Judgments	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (number of judgements or consent decrees meeting criteria)	0	0%
and Consent Decrees	Any adjudicated final court judgments and default judgments, or non- adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	O	0%
Convictions	Any criminal convictions of this state or the federal government (number of counts)	1	50%
Emissions	Chronic excessive emissions events (number of events)	0	0%
Àudits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted)	34	-34%
Addits	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which violations were disclosed)	6	-12%
	1	se Enter Yes or No	1
	Environmental management systems in place for one year or more	No	0%
Other	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
o and	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%
	Adjustment Pero	centage (Sub	total 2) 543%
Repeat Violator (The contraction of the contracti	Company of the Compan	And the second of the second o
Yes	Adjustment Perd	centage (Sub	total 3) 25%
Compliance Histo	ry Person Classification (Subtotal 7)	Service Services	
Average Pe	rformer Adjustment Perc	centage (Sub	total 7) 0%
Compliance Histo	ry.Summary		1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
Compliance History Notes	Enhancement for one NOV with same/similar violations, 15 months of self-repo violations, 62 NOVs with dissimilar violations, 11 orders without denial, three order one criminal conviction, and repeat violator status; and a reduction for 34 Notices six disclosures of violation.	ers with denial,	

Total Adjustment Percentage (Subtotals 2, 3, & 7)

#	creening Date		Docket No. 2010-1527-IWD-E	PEW
*	Respondent Case ID No.	BP Products Nort	h America Inc.	Policy Revision 2 (September 2002)
Reg. Ent.	Reference No.			PCW Revision October 30, 2008
	edia [Statute]			Australia de la Carta de Carta
	f. Coordinator			
	/iolation Number	1		
	Rule Cite(s)	Tex. Water Cod	le § 26,121(a)(1), 30 Tex. Admin. Code § 305.125(1), a	and Texas
•			arge Elimination System ("TPDES") Permit No. WQ0000	443000,
Page 1		Eff	went Limitations and Monitoring Requirements No. 1	
4. pagenya			the unauthorized discharge of a nonpermitted wastewa	
			105, as documented during investigations conducted on	
			n 24, 2010; Specifically, on February 16, 2010, during a k, approximately 5,466 pounds of toluene mixed with W	
			lpha the wastewater treatment plant; and from February 1	
Viol	ation Description	through February	y 18, 2010, approximately 24.31 million gallons of partia	illy treated
		wastewater i	mixed with followne was discharged through Outfall 005,	killing
			33 fish. This discharge also resulted in exceedances of nolics daily average loading and daily maximum loading I	
			("lbs/day") and 56 lbs/day, respectively, for the monitor	
		ending Februar	ry 28, 2010 (37,869 lbs/day and 409,024 lbs/day, respe	ectively).
	fr			
:			Bas	se Penalty \$10,000
>> Environi	nental, Proper	y and Humai	n Flealth Matrix	
			Harm	200
OR	Release Actual	Major x	Moderate Minor	The same of the sa
	Potential		Percent 100%	· Vi cipe
A. P. P. Barrier, W.	enco XXIII i a successi al III a successi a			papagaana
>>Program	matic Matrix	A - J		Tagana and an analysis and an an analysis and
Parties of the state of the sta	Falsification	Major 1	Moderate Minor Percent 0%	
A STATE OF THE STA	<u> </u>		Porcent V/O	į .
Matr	ix Human health	or the environme	ent has been exposed to pollutants which exceed protec	tive levels
Note	es		as a result of this yipiation,	
			za z	\$0
	AND THE STATE AN	2 (1) (1) (1) (1) (1) (1) (1) (1) (1) (1)	Adjustment	\$0
			Adjustment	\$10,000
Violation₌Ev	ent s		Adjustment	
Viölätiön Ev				\$10,000
Viölätiön Ev		iolation Events	Adjustment 5 Number of violation	\$10,000
Violation Ev		iolation Events	5 Number of violation	\$10,000
Violation Ev				\$10,000
Violation Ev	Number of V	daily weekly monthly	5 Number of violation	\$10,000 days
Viölätlön Ev		daily weekly monthly quarterly	5 Number of violation	\$10,000 days
Violation Ev	Number of V mark only one	daily weekly monthly quarterly semiannual	5 Number of violation	\$10,000 days
Violation Ev	Number of V mark only one	daily weekly monthly quarterly semiannual	5 Number of violation	\$10,000 days
Violation Ev	Number of V mark only one with an x	daily weekly monthly quarterly semiannual annual single event	5 Number of violation X Violation Bas	\$10,000 standard \$10,000 standard \$50,000
Violation Ev	Number of V mark only one with an x Five dally eve	dally weekly monthly quarterly semiannual annual single event	5 Number of violation X Violation Bas ended from the date of the discharge (February 16, 201)	\$10,000 days se Penalty \$50,000
Violation Ev	Number of V mark only one with an x Five dally eve	daily weekly monthly quarterly semiannual annual single event ents are recomme	5 Number of violation X Violation Bas	\$10,000 days se Penalty \$50,000
	Mumber of V mark only one with an x Five daily even date the disch	dally weekly monthly quarterly semiannual annual single event ents are recomme	Violation Basemaded from the date of the discharge (February 16, 201) pollutant levels in the hurricane canal had been reduced to the environment (February 20, 2010).	\$10,000 days se Penalty \$50,000 0) to the dito levels
	Number of V mark only one with an x Five dally eve	dally weekly monthly quarterly semiannual annual single event ents are recomme	Violation Basemaded from the date of the discharge (February 16, 201) pollutant levels in the hurricane canal had been reduced of the environment (February 20, 2010).	\$10,000 days se Penalty \$50,000
	Number of V mark only one with an x Five daily eve date the disch	daily weekly monthly quarterly semiannual annual single event ents are recomme	Violation Basemaded from the date of the discharge (February 16, 201) pollutant levels in the hurricane canal had been reduced to the environment (February 20, 2010).	\$10,000 days se Penalty \$50,000 0) to the dito levels
	Number of V mark only one with an x Five daily eve date the disch	daily weekly monthly quarterly semiannual annual single event ents are recommenarge ceased and protectly	Violation Bas when the date of the discharge (February 16, 201 pollutant levels in the hurricane canal had been reduced to the environment (February 20, 2010). 10.0% Reduction Before NOV NOV to EDPRP/Settlement Offer	\$10,000 days se Penalty \$50,000 0) to the dito levels
	Number of V mark only one with an x Five daily eve date the disch	daily weekly monthly quarterly semiannual annual single event ents are recomme	Violation Basemaded from the date of the discharge (February 16, 201) pollutant levels in the hurricane canal had been reduced of the environment (February 20, 2010).	\$10,000 days se Penalty \$50,000 0) to the dito levels
	Number of V mark only one with an x Five daily eve date the disch	daily weekly monthly quarterly semiannual annual single event ents are recomme arge ceased and protectly Extraordinary Ordinary N/A	Violation Base violation the date of the discharge (February 16, 201 pollutant levels in the hurridane canal had been reduced the environment (February 20, 2010). 10.0% Reduction Sefore NOV NOV to EDPRP/Settlement Offer X (mark with x)	\$10,000 days se Penalty \$50,000 0) to the dito levels
	Number of V mark only one with an x Five daily eve date the disch	daily weekly monthly quarterly semiannual annual single event ents are recommetarge ceased and protectly Extraordinary Ordinary	Violation Base violation before NOV Reduction February 20, 2010). 10.0% Reduction Before NOV NOV to EDPRP/Settlement Offer X	\$10,000 days se Penalty \$50,000 0) to the dito levels
	Number of V mark only one with an x Five daily eve date the disch	daily weekly monthly quarterly semiannual annual single event ents are recomme arge ceased and protectly Extraordinary Ordinary N/A	Violation Base violation the date of the discharge (February 16, 201 pollutant levels in the hurridane canal had been reduced to of the environment (February 20, 2010). 10.0% Reduction Before NOV NOV to EDPRP/Settlement Offer X (mark with x) The Respondent achieved compliance on October 12, 2010.	\$10,000 days See Penalty \$50,000 0) to the difference of the levels \$5,000
Good Faith	Mumber of V mark only one with an x Five daily even date the discherence of the control of the	daily weekly monthly quarterly semiannual annual single event ents are recommetarge ceased and protectly Extraordinary Ordinary N/A Notes	Violation Bas Wiolation Bas Property of the discharge (February 16, 201) Proposition by the hurricane canal had been reduced to the environment (February 20, 2010). 10.0% Reduction Before NOV NOV to EDPRP/Settlement Offer X (mark with x) The Respondent achieved compliance on October 12, 2010. Violation	\$10,000 days se Penalty \$50,000 0) to the dito (evels \$5,000)
Good Faith	Number of V mark only one with an x Five daily eve date the disch	daily weekly monthly quarterly semiannual annual single event ents are recommetarge ceased and protectly Extraordinary Ordinary N/A Notes	Violation Bas Wiolation Bas Property of the discharge (February 16, 201) Proposition by the hurricane canal had been reduced to the environment (February 20, 2010). 10.0% Reduction Before NOV NOV to EDPRP/Settlement Offer X (mark with x) The Respondent achieved compliance on October 12, 2010. Violation	\$10,000 days se Penalty \$50,000 0) to the dito (evels \$5,000)
Good Faith	Number of V mark only one with an x Five daily ever date the discher.	daily weekly monthly quarterly semiannual annual single event ents are recommetarge ceased and protectly Extraordinary Ordinary N/A Notes	Violation Bas Wiolation Bas Property of the discharge (February 16, 201) Proposition by the hurricane canal had been reduced to the environment (February 20, 2010). 10.0% Reduction Before NOV NOV to EDPRP/Settlement Offer X (mark with x) The Respondent achieved compliance on October 12, 2010. Violation	\$10,000 days se Penalty \$50,000 0) to the dito levels \$5,000 \$5,000
Good Faith	Number of V mark only one with an x Five daily ever date the discher.	daily weekly monthly quarterly semiannual annual single event ents are recomme arge ceased and protectly Extraordinary Ordinary N/A Notes this violation	Violation Baseman Inc. 10, 2011 10.0% Reduction Before NOV NOV to EDPRP/Settlement Offer X (mark with x) The Respondent achieved compliance on October 12, 2010. Violation Statutory Limit	\$10,000 days se Penalty \$50,000 0) to the distribution \$5,000 \$5,000 f. Test salty Total \$329,000

eg. Ent. Reference No Media Violation No	Water Quality				W. 181.	Percent Interest	Years of Depreciation
						5.0	1!
	Item Cost	Date Required	Final Date	Yrs I	iterest Sav	ed Onetime Costs	EB Amount
Item Description	No commas or \$						
Delayed Costs	يئترندا اب برندع		aria si adhiba		âgă.		
Equipment			3	0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$6	\$0
Engineering/construction				0.00	\$0	\$0	\$0
Land	V-12-10-11-11-11-11-11-11-11-11-11-11-11-11-	The second second		0.00	\$0	n/a	\$0
Record Keeping System	S	and the second second		0.00	\$0	n/a	\$0
		**************************************	(3 O L 30 (0)	A 2 P	\$33	n/a	\$33
Training/Sampling	\$1,000	16-Feb-2010	12-Oct-2010	0.65			
Training/Sampling Remediation/Disposal	\$1,000 \$97,753	16-Feb-2010 16-Feb-2010		0.01	\$54	n/a	\$54
				0.01		n/à. n/à.	\$54 \$0
Remediation/Disposal	#97,753 Estimated cos	16-Feb-2010 st to update oper	20-Feb-2010 atlonal procedul affected area an	0.01 0.00 0.00 es to pre	\$54 \$0 \$0 \$0 vent future cove and disp	n/a, n/a n/a occurrences and actua ose of the dead fish.	\$54 \$0 \$0 I cost to collect Date required is
Remediation/Disposal Permit Costs	#97,753 Estimated cos and analyze so the date of the	to update oper amples from the discharge. Fin. 2010) and the o	20-Feb-2010 atlonal procedul affected area an al dates are the	0.01 0.00 0.00 es to pred d to rem date by	\$54 \$0 \$0 \$0 vent future of ove and dispowhich proced on the hurrical	n/a, n/a n/a occurrences and actua ose of the dead fish. ures were updated an ne canal had been red	\$54 \$0 \$0 I cost to collect Date required is d implemented
Remediation/Disposal Permit Costs Other (as needed)	Estimated cos and analyze so the date of the (October 12)	16-Feb-2010 It to update operamples from the edischarge. Find 2010) and the edischarge pro	ational procedul affected area an al dates are the date the pollutar tective of the en	6.01 6.00 0.00 es to predict to remidate by a tevels liverable with the comment of the commen	\$54 \$0 \$0 vent future cove and disposed which proced in the hurrical of (February :	n/a	\$54 \$0 \$0 I cost to collect Date required is d implemented uced to levels ded costs)
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Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel spection/Reporting/Sampling Supplies/equipment Financial Assurance [2]	Estimated cos and analyze so the date of the (October 12)	16-Feb-2010 It to update operamples from the edischarge. Find 2010) and the edischarge pro	ational procedul affected area an al dates are the date the pollutar tective of the en	es to pred to rem date by the levels liveronmer entering 0.00 0.00 0.00 0.00 0.00	\$54 \$0 \$0 vent future cove and disposed in the hurrical it (February : item (excel \$0 \$0 \$0 \$0 \$0 \$0	n/a	\$54 \$0 \$0 I cost to collect Date required is d implemented fuced to levels ded costs) \$0 \$0 \$0 \$0
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Respondent 6P Products North America Inc. Respondent 6Q Addes Reg. Ent. Reference No. RM10255077 Medial (Statute) Ent. Coordinator Large Food Violation Number Violation Description Failed to prevent the smath-prized displayage loss 2.3. Failed to prevent the smath prized loss and advanced on Hights 17, 50.1, and Survey 22, 2010, a less in the failed log pipeline discharged objects displayage loss and smathes and smathes 17, 50.1, and Survey 24, 2010. Sensitive of the smath discharge loss and smathes 2.3. Failed to prevent smathes 2.3. Responsible Matrix Homan health or the environment has been expassed to significant amounts of pollutarity which do not success facels that are proteptive of human health or environmental resigning. Sensitive of the smathes 2.3. Sensitive of the smathes 2.3. Represent Solo. Sensitive of the discharge (January 27, 2010) to the date of compliance (March 18, 2010). Violation Subtotal Two monthily events are recommended from the date of the discharge (January 27, 2010) to the date of compliance (March 18, 2010). Respondent schewer of the discharge (January 27, 2010) to the date of compliance (March 18, 2010). Violation Subtotal The Respondent schewer compliance on March 18, 2010. Violation Final Penalty To		ening Date			et No. 2010-1527-IWD-E	PGW
Reg. Ent. Reference No. NRI02535077 Media [Statute] Water Quality Enf. Coordinator Lance Foard Violation Number Violation Number Violation Entering				erica Inc.		
Media [Statute] water Quality Enf. Coordinator Lapes Foard Violation Number Rule Cite(s) Falled to prevent the unachroneded displayed of distartial waste into or adjacent to water in the state. Specifically, viol adjacent 27, 2010, a leak in the Displaydo pipeline discipling displayment 27, 2010, a leak in the Displaydo pipeline discipling displayment 27, 2010, a leak in the Displaydo pipeline discipling displayment 27, 2010, a leak in the Displaydo pipeline discipling displayment 27, 2010, a leak in the Displaydo pipeline discipling display from comparing the pipeline discipling display from the Displaydo pipeline display from the Displaydo pipeline displayment of the						PCW Revision October 30, 2008
First Coordinator Lange Food Total Coordinator Total Coordin						
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Borrow Dirch, as documented during investigations conducted on March 17, 2010, and March 24, 2010. Base Penalty \$10,000			water in the state.	. Specifically, on Januar	y 27, 2010, a leak in the big	śludge
Seconomic Banefit (EB) for this violation Statutory Limit Test	Violatio	on Description				
Sase Penalty \$10,000			BOTTOW DITCH, as type			J 2010,
>> Environmental, Property and Human Health Matrix Harm Release Major Moderate Minor Percent 50% >> Programmatic Matrix Palsification Major Moderate Minor Percent 0% Matrix Matrix Matrix Major Moderate Minor Percent 0%	i i			<u> 18. julija (j. 18. j. j. j.</u>		Sandara na Maranagan
Release Actual Notes Actual Notes Actual Notes Percent Sove Notes Percent Sove Notes Palsification Major Moderate Minor Percent Over Notes Palsification Major Moderate Minor Percent Over Notes Percent Over Notes Percent Over Notes Not					Base	e Penaity \$10,000
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Percent 50% >>Programmatic Matrix Falsification Najor Moderate Minor Percent 0% Matrix Notes Requested levels that are protective of human health or environmental receptors. **Adjustment** **Sp.000** **Adjustment** **Sp.000** **Adjustment** **Sp.000** **Violation Events** Number of Violation Events** **Number of Violation Base Penalty** **Indiana Annual ann	A ST AND	Dologeo	A. Carrier and A. Car			
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Estimated EB Amount \$596 Violation Final Penalty Total \$64,300		•		•	Violation	Subtotal \$7,500
Estimated EB Amount \$596 Violation Final Penalty Total \$64,300	Economic Bene	fit (EB) for	his violation		Statutory Limit	:Test
				\$596	Violation Final Pen	alty Total \$64,300
This violation Final Assessed Penalty (adjusted for limits) \$64,300				· · · · · · · · · · · · · · · · · · ·		
	1 (1) - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 -		TI	nis violation Final Ass	sessed Penalty (adjusted f	or iimits) \$64,300

leg. Ent. Reference No. Media Violation No.	Water Quality	•					
Violation No.	∵2					Percent Interest	Years of Depreciation
	55	ing the second	والقريفان معام يونوس الراويعة	15 15 5 Ta	on a What built #487	- A	
	Tennis Cons	Date Required	Einal Data	Vre	Interest Sayad	5.0 Onetime Costs	EB Amount
when in the second and the			THURST CO.				
Item Description	. No commas or \$		- 32111111111111111111111111111111111111			A ratio Not Red	1000000
Belleva document	erne vale e na da	waanaa ee cata		us Naca			
Delayed Costs		1		0.00	\$0	\$0	\$0
Buildings			1000	0.00	\$0	\$0	\$0
Other (as needed)			27.0	0,00	\$0	\$0	\$0
Engineering/construction				0.00	\$0	\$0	\$0
Land			10 (000) 700	0,00	\$0	n/a	\$0
Record Keeping System			and the second s	0.00	\$0	n/a	\$0
Training/Sampling				0,00	\$0	т п/а	\$0
Remediation/Disposal	\$87,000	27-Jan-2010	18-Mar-2010	0.14	\$596	n/a	\$596
Permit Costs				0.00	\$0	.* : n/a	\$0 \$0
Other (as needed)		Ji					
	Fetimated co	act to renair the h	losludae plaeliiti		\$0 ean the affected a	n/a areà. Date required	
Notes for DELAYED costs	and the state of t	the	discharge. Fina	and cl I date (lean the affected a s the date of com	areà. Date required pilance.	is the date of
Avoided Costs	and the state of t	the	discharge. Fina	and cl I date (ean the affected as the date of com	area, Date required pilance. for one-time avoid	is the date of
Avoided Costs	and the second s	the	discharge. Fina	and cl date (enterin	lean the affected as the date of comp ig item (except)	area, Date required pliance. for one-time avoid	is the date of led costs) \$0
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Avoided Costs Disposal Personnel spection/Reporting/Sampling	and the second s	the	discharge. Fina	and cl date (nterin 0.00 0.00 0.00	lean the affected as the date of comp of item (except: \$0: \$0: \$0: \$0: \$0: \$0: \$0: \$0	orea, Date required pliance. for one time avoid \$0 \$0 \$0 \$0 \$0 \$0 \$0	is the date of section is the date of section is section. Section is section is section.

ge. general el colony ryanny accure	Sere	ening Date	10-Sep-2010	eperioristical Mentional American providenti programment Colorida Cristical insertican Colorida Civi	Docket N	0. 2010-1527-IWD-E	CONTRACTOR	PCW
· ·			BP Products No	rth America Inc.			Policy Revision	n 2 (September 2002)
		Case ID No.					PCW Revi	sion October 30, 2008
Reg.		erence No.						7
:		a [Statute] Coordinator						Acronia e
		ation Number						*
	VIOI	Rule Cite(s)	THE PARTY OF THE P	- Company of the Comp				. *************************************
						Code § 305.125(1), and nd Monitoring Requireme		TO THE STATE OF TH
	Violatío	n Description	documented d the fecal colifo	luring a record review orm daily maximum ex milliteis ("cfu/100mL	conducted on ceeded the p	or fecal colliform at Outfa n Oftober 11, 2010. Spe ermit limit of 400 colony nitoring period ending N DOML).	cifically, forming	·
						Base	Penalty	\$10,000
>> Env	ironmei	ital, Proper	ty and Huma	an Health Matrix Harm	Granden and Anna Control of the Cont	ANY CONTROL OF THE PROPERTY OF		
		Release	Major	Moderate Minor				
OR		Actual		X				Comp.
		Potential	<u></u>			Percent 50%		
			paranti, popa spektyra e					· · · · · · · · · · · · · · · · · · ·
>>Prog	ıramma	tic Matrix Falsification	Major	Moderate Minoi		The state of the s		alled to
						Percent 0%		7
	1					<u> </u>		
2 1 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	Matrix Notes	Human health not exceed lev	or the environmels that are prot	nent has been expose ective of human healt violatio	h or environn	nt amounts of pollutants nental receptors as a res	which do sult of the	was na depublica e e manne e e e e e e e e e e e e e e e e e e
							#E 000	477 NAT 274
		According to the second	A CONTRACTOR OF THE CONTRACTOR		SECTION OF THE PARTY OF THE PAR	Adjustment	\$5,000	A. T. Waller
							L	\$5,000
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Aidigrio		A control of the cont			MARKET PROPERTY IN THE		ET / BETTINE STUDE	
		Number of V	iolation Events	1	30	Number of violation	days	
			daily weekly					A Section of the Control of the Cont
		mark only one	monthly	<u> </u>		Violation Base	. Bonaltu	\$5,000
		with an x	quarterly semiannual	<u> </u>		Violation Base	Penalty	\$5,000
			annual	***************************************				and the same of th
			single event					Visit in the second
	1	Populario de la companio de la comp	namen and the second		and the second s		continues comment	a constant
		ı	One monthly eve	ent is recommended fo	or the month	of November 2009.	***************************************	
			UMANAMAN AND AND AND AND AND AND AND AND AND A					er en
Good Fa	aith Effe	rts to Com	ilv.	25.0% Reduction	in division			\$1,250
			- Acceptance of the Company of the C		PRP/Settlement	Offer		
	•		Extraordinary [or infrared to con-
			Ordinary	X				de contraction de con
			N/All	(mark witi	1 X)			. [
			Notes		eved complia: Märch 31, 20	nce with effluent limits 110.		
						Violation	Subtotal	\$3,750
Econom	nic Benë	fit (EB) för	this violatio	n y v	A SECURITY OF THE PROPERTY OF	Statutory Limit	Test	
			_		\$23	Violation Final Pen	_	\$32,150
		Estimate	ed EB Amount				_	
. pr. garage constant when the	and the second second second	al y magazini anti sikali ayan besir i sisilik kemil	ranas era a litar habas filosofia has essa e e si si e ca e casa	This violation F	inal Assesse	ed Penalty (adjusted f	or limits)	\$32,150
1.724263650	ACT VALUE OF		The second secon	A STATE OF THE PROPERTY OF THE		The company of the co	A Company of the Comp	A STATE OF THE STA

Case ID No.							
eg. Ent. Reference No.	KN1025350//	•				1. 11. 11. 11. 11. 11. 11. 11. 12. 12. 1	Years of
	Water Quality					Percent Interest	Depreciation
Violation No.	3	11 11 W. C. (NO. 21 COMPANY)	TO SERVICE AND THE CONTRACT OF	entrem	**************************************		u sessella i i i i i i i i i i i i i i i i i i
	Nga Salama.				Continue	5.0	1!
The best of the second of the	Item Cost	Date Required	- Final Date	Yrs I	Interest Saved	Onetime Costs	EB Amount
Item Description	7 3 7 3 7 3 7 5 7 5 7 5 7 5 7 5 7 5 7 5	F. 7. 11 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1					
rem: Description:	мо соппная ог з	Control of the contro		Files I will be a suit		ryd ragwing in a	
		September (Kromoton) - 100 miles and 100 miles					
Delayed Costs	- San	Tanking a	parily ram and Diffeed each	1		\$0 T	\$0
Equipment		4		0.00	\$0 \$0	\$0 \$0	\$0 \$0
Buildings		-		0.00	<u>şu</u> \$0	\$0 \$0	\$0 \$0
Other (as needed)	44 000	 30 N=: 3000	24 14 2040	0.00	\$0 \$1	\$22	\$23
Engineering/construction	\$1,000	30-Nov-2009	31-Mar-2010		\$0 \$0	722 n/a	\$0
Land		4		0.00	. \$0	n/a	\$0
Record Keeping System				0.00	\$0 \$0	n/a	\$0 \$0
Training/Sampling					\$0 \$0	n/a	\$0
Remediation/Disposal				0.00			
				0.00	άΔ		<u> ስ</u> ሳ
Permit Costs			·	0.00	\$0	n/a	<u>\$0</u>
Other (as needed)	Eatlmakad	anch to important	The series of n	0.00	\$0	n/ <u>a</u> 2=====	\$0
Other (as needed) Notes for DELAYED costs	effluent limi	its. Date required	l is the initial da	0.00 oncompli e of non	\$0 lance and return compliance. Fin	n/a to compliance with a al date is the date o	\$0 all permitted f compliance.
Other (as needed) Notes for DELAYED costs Avoided Costs	effluent limi	its. Date required	l is the initial da	0.00 oncompli se of non	\$0 ance and return compliance. Fin item (except	to compliance with al date is the date o for one-time avoic	\$0 all permitted f compliance.
Other (as needed) Notes for DELAYED costs AVOICIED COSTS Disposal	effluent limi	its. Date required	l is the initial da	0.00 oncompil te of non on terinc 0.00	\$0 iance and return compliance. Fin j item (except	n/a to compliance with a date is the date of the date	\$0 all permitted f compliance. led costs)
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel	effluent limi	its. Date required	l is the initial da	o.00 oncompli e of non entering 0.00	\$0 lance and return compliance. Fin litem (except \$0 \$0	to compliance with all date is the date of for one-time avoid \$0 \$0	\$0 all permitted f compilance. led costs) \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel spection/Reporting/Sampling	effluent limi	its. Date required	l is the initial da	entering	\$0 lance and return icompilance. Fin \$0 \$0 \$0 \$0	to compliance with a laid date is the date of the compliance with a solution of the complete	\$0 all permitted f compliance. led costs) \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel spection/Reporting/Sampling Supplies/equipment	effluent limi	its. Date required	l is the initial da	0.00 encomplice of non	\$0 ance and return compllance. Fin gitem (except \$0 \$0 \$0 \$0	to compliance with a laid date is the date of for one-time avoic \$0 \$0 \$0 \$0	\$0 all permitted f compliance. continued f costs \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs AVOIDED COSTS Disposal Personnel spection/Reporting/Sampling Supplies/equipment Financial Assurance [2]	effluent limi	its. Date required	l is the initial da	0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00	\$0 ance and return compliance. Fin \$0 \$0 \$0 \$0 \$0 \$0 \$0	to compliance with a date is the date of for one-time avoid \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 all permitted f compliance. led costs) \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs AVOIDED COSTS Disposal Personnel spection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	effluent limi	its. Date required	l is the initial da	0.00 0.	\$0 ance and return compliance. Fin \$0 \$0 \$0 \$0 \$0 \$0 \$0	to compliance with all date is the date of for one-time avoid \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 all permitted f compliance. continued f costs \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs AVOIDED COSTS Disposal Personnel spection/Reporting/Sampling Supplies/equipment Financial Assurance [2]	effluent limi	its. Date required	l is the initial da	0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00	\$0 ance and return compllance. Fin gitem (except \$0 \$0 \$0 \$0	to compliance with a date is the date of for one-time avoid \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 all permitted f compliance. led costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs AVOIDED COSTS Disposal Personnel spection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	effluent limi	its. Date required	l is the initial da	0.00 0.	\$0 ance and return compliance. Fin \$0 \$0 \$0 \$0 \$0 \$0 \$0	to compliance with all date is the date of for one-time avoid \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 all permitted f compliance. led costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs AVOIDED COSTS Disposal Personnel spection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)	effluent limi	its. Date required	l is the initial da	0.00 0.	\$0 ance and return compliance. Fin \$0 \$0 \$0 \$0 \$0 \$0 \$0	to compliance with all date is the date of for one-time avoid \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 all permitted f compliance. led costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs AVOIDED COSTS Disposal Personnel spection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	effluent limi	its. Date required	l is the initial da	0.00 0.	\$0 ance and return compliance. Fin \$0 \$0 \$0 \$0 \$0 \$0 \$0	to compliance with all date is the date of for one-time avoid \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 all permitted f compliance. led costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

	Date 10-Sep-2010 Docket No. 2010-1527-IWD-E lent BP Products North America Inc.	PCW Policy Revision 2 (September 2002)
	No. 40405	PCW Revision October 30, 2008
Media (Stat	ute] Water Quality	·
Enfa Coordin Violation Nu	ator Lanae Foard	
Rule Ci	Tex. Water Code § 26.121(a)(1), 30 Tex. Admin. Code § 305.125(1), and Permit No. WQ0000443000, Effluent Limitations and Monitoring Requirement	
Violation Descri	Falled to comply with the permitted effluent limit for fecal coliform at Outfal documented during a record review conducted on October 11, 2010. Spatthe fecal coliform daily maximum exceeded the permit limit of 400 cfg/100 the monitoring period ending May 31, 2009 (5,700 cfu/100ml).	cifically,
1	Base	Penalty \$10,000
>> Environmental, Pr	perty and Human Health Matrix	
to the same and th	Harm ease Major Moderate Minor	
, 1	ctual X Percent 100%	
	[astronomical and a second sec	
>>Programmatic Mati	tion Major Moderate Minor	7-10-10-10-10-10-10-10-10-10-10-10-10-10-
For containing a first angle of the second s	Percent 0%	de de la companya de
Matrix Human h Notes	ealth or the environment has been exposed to pollutants which exceed protective a result of this violation.	levels as
for the first of the second second second to the second second second second second second second second second	Adjustment	<u>\$0</u>]
		\$10,000
Violation Events		
Numbe	er, of Violation Events 1 31 Number of violation d	ays
mark only with an		Penalty \$10,000
	One monthly event is recommended for the month of May 2009.	To Annual
Good Faith Efforts to C	25.0% Reduction	\$2,500
	Before NOV NOV to EDPRP/Settlement Offer Extraordinary	; 4 :
	Ordinary x (mark with x)	or commented
	Notes The Respondent achieved compliance with effluent limits by March 31, 2010.	Value of the state
	Violation :	Subtotal \$7,500
Economic Benefit (EB)	för this violation Statutory Limit	Těšt
:	imated EB Amount \$0 Violation Final Pena	Ity Total \$64,300
	This violation Final Assessed Penalty (adjusted fo	r limits) \$64,300

		conomic	Benefit	WO	rksneet		
Respondent	BP Products N	orth America Inc.					
Case ID No.	40405						
g. Ent. Reference No.							
	Water Quality						Years of
Violation No.						Percent Interest	Depreciation
	Baylarya, 200	وارالارسار سالهم والإراد			an eller ACTETIC	5.0	1.
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description		and the second of the second of	STRIP A TEMPORAL WATER STREET				
rem pescuption	r an coulings of 4	LVII JAMI SIBALKINIS	ter i translit t _e . I i i	- 1 -11	TO ALIPERATE	LECTAL 1	
		gargrandinan dheel	alitera di la	arii erii .		TET II	
Delayed Costs		لادرين والمستحد والمستنومال	S. 201 No. 1	0.00	\$ 0	\$0 I	\$0
Equipment Buildings	- Children Color C			0.00	\$0 \$0	\$0	\$0
Other (as needed)				0.00	\$0 \$0	\$0	\$Ö.
Engineering/construction				0.00	\$0	\$0	\$0
Land				0,00	\$ 0	n/a	\$0
Record Keeping System	7	<u> </u>		0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0,00	\$0	in/a	\$0
Other (as needed)	The state of the s		CONTRACTOR OF THE PARTY OF THE	0.00	\$0	n/a	\$0
			•				
Notes for DELAYED costs		MARCA (1907) . AARAN (1907) AARAN (1907)			1 is included with \		Indepeted:
Avoided Costs	ANNUAL	MARCA (1907) . AARAN (1907) AARAN (1907)		enterij	ng item (except	for one time avoid	led costs)
Avoided Costs Disposal	annual.	MARCA (1907) . AARAN (1907) AARAN (1907)		e nte rij 0.00	ng Item (except	for one-time avoid	
Avoided Costs Disposal Personnel	ANNUAL	MARCA (1907) . AARAN (1907) AARAN (1907)		e nte rij 0.00 0.00	ng item (except \$0 \$0	for one-time avoid \$0 \$0	\$0
Avoided Costs Disposal Personnel spection/Reporting/Sampling	ANNUAL	MARCA (1907) . AARAN (1907) AARAN (1907)		e nte rij 0.00	ng Item (except	for one-time avoid	\$0 \$0
Avoided Costs Disposal Personnel spection/Reporting/Sampling Supplies/equipment	annual.	MARCA (1907) . AARAN (1907) AARAN (1907)		enterij 0.00 0.00 0.00	ng Item (except \$0 \$0 \$0	for one-time avoid \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel spection/Reporting/Sampling	ANNUÁL	MARCA (1907) . AARAN (1907) AARAN (1907)		0.00 0.00 0.00 0.00 0.00	ng Item (except \$0 \$0 \$0 \$0 \$0 \$0 \$0	for one-time avoid \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Personnel Spection/Reporting/Sampling Supplies/equipment Financial Assurance [2]	ANNUAL	MARCA (1907) . AARAN (1907) AARAN (1907)		0.00 0.00 0.00 0.00 0.00 0.00	ng Item (except \$0 \$0 \$0 \$0 \$0	for one-time avoid \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel spection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	ANNUÁL	MARCA (1907) . AARAN (1907) AARAN (1907)		0.00 0.00 0.00 0.00 0.00 0.00	ng Item (except \$0 \$0 \$0 \$0 \$0 \$0 \$0	for one-time avoid \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel spection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	ANNUÁL	MARCA (1907) . AARAN (1907) AARAN (1907)		0.00 0.00 0.00 0.00 0.00 0.00	ng Item (except \$0 \$0 \$0 \$0 \$0 \$0 \$0	for one-time avoid \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel spection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)	ANNUAL	MARCA (1907) . AARAN (1907) AARAN (1907)		0.00 0.00 0.00 0.00 0.00 0.00	ng Item (except \$0 \$0 \$0 \$0 \$0 \$0 \$0	for one-time avoid \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel spection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)	ANNUAL	MARCA (1907) . AARAN (1907) AARAN (1907)		0.00 0.00 0.00 0.00 0.00 0.00	ng Item (except \$0 \$0 \$0 \$0 \$0 \$0 \$0	for one-time avoid \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel spection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)	ANNUAL	MARCA (1907) . AARAN (1907) AARAN (1907)		0.00 0.00 0.00 0.00 0.00 0.00	ng Item (except \$0 \$0 \$0 \$0 \$0 \$0 \$0	for one-time avoid \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0

	eening Date			Docket N	o. 2010-1527-IWD-E		PCW
		BP Products No	rth America Inc.			-	(September 2002)
	Case ID No.					PCW Revision	1 October 30, 2008
Reg. Ent. Re	ia [Statute]						
	coordinator						
Henry	lation Number	-01170					ł
*10	Rule Cite(s)	السيدين تشتينا المستوالية	rde 8 26 121(a)(1) 30 Tex Admin	. Code § 305.125(1), an	d TPDES	
					nd Monitoring Requirem		
					nits for oil and grease an	- Anna Carlotte Control of the Contr	•
Violatio	on Description	recoverable conducted on exceeded the period ending dally average	e phenolics at Ou October 11, 20 permit limit of 2 June 30, 2009, and dally maxim tively; for the m	itfall 006, as docur 10. Specifically, th ,520 pounds per d (5,370 lbs/day) an um exceeded the p	nented during a record recoil and grease daily may ("ibs/day") for the mod the total recoverable permit limits of 24 lbs/daiding June 30, 2009 (28	evlew aximum onitoring ohenolics y and 56	
	·				Bas	e Penalty	\$10,000
>> Environme	ntal, Proper	ty and Huma	in Health Ma Harm	itríx			
A CONTROL OF THE STATE OF THE S	Release	Major	Moderate	Minor			4
OR	Actual	r - 13,31	x				
A CONTRACT OF THE PROPERTY OF	Potential				Percent 50%		
The second secon	and the second s				to street		
>>Programma		A CONTROL OF THE PROPERTY OF T		And the second second second	Control of the first control o		· we tribute
	Falsification	Major	Moderate	Minor	D		100
A CONTROL OF THE PROPERTY OF T	L	<u> </u>			Percent 0%		V
Matrix Notes	II.	45.1		f human health or	nt amounts of pollutants environmental receptors Adjustment		\$5,000
							\$3,000
Violation Even	ß	With the second		A CONTRACTOR OF THE PROPERTY O	The same of the sa		ge 'r ce aget.
	Number of \	/iolation Events	<u></u>	30	Number of violation	days	ist jölje (vanadane
	mark only one with an x	daily weekly monthly quarterly semiannual annual single event	X		Violation Base	e Penaity	\$5,000
	One mor	nthly event is rec	ommended for t	he quarter contain	ing the month of June 2	009.	
× Good Faith Eff	orts to Com	ă IV.	25.0% Re	duetion		100 100 100 100 100 100 100 100 100 100	\$1,250
XAAN EGINEE()	Aire TA MARII			Udection V to EDPRP/Settlement	: Offer		12/2001
		Extraordinary					1
		Ordinary	× l				*
		N/A		ark with x)			again re sy
		Notes	The Responden	t achieved complia by March 31, 20	nce with effluent limits 310.		3 To 10 To 1
		Ľ	, , , , , , , , , , , , , , , , , , ,		Violation	Subtotal	\$3,750
Economic Ben	efit (EB) for	this violatio	ń		Statutory Limil	Test	
		ed EB Amount		\$0	Violation Final Pen	alty Total	\$32,150
	SSN 285 Wildersongerentungen 6		This violat	ion Final Assesse	ed Penalty (adjusted f	or limits)	\$32,150
Exilation for the first of the forest control of the first of the firs	and the second of the second s			The second secon	The second secon		

	RN102535077 Water Quality					Percent Interest	Years of Depreciation
Violation No.	.)	Burney Commence	La removação do	oka ito		5.0	1!
	Them Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description	And the second of the second o			· Printings		and the state of t	
Delayed Costs		er ul dalam		18 HH	erek yalı baz		<u> </u>
Equipment	The state of the s		,	0.00	\$0	\$0.	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	.\$0	\$0
Engineering/construction	anantation division distribution of			.0.00	\$0	\$0	\$0
Land				0,00	£0	sa n/a	\$0
Record Keeping System	grand and an area			0.00	\$0	n/a	\$0
Training/Sampling	A SAN DAMES AND THE RES			0.00	\$0	n/a	<u>\$0</u>
Remediation/Disposal	34000000000000000000000000000000000000			0.00	<u>\$0</u>	n/a ,	\$0
Permit Costs			·	0.00	<u> </u>	r n/a	\$0
Other (as needed)	27	<u> </u>		0.00	\$0	n/a	\$0
Other (as needed) Notes for DELAYED costs		Economic b	enefit for this v		su Is included with \	- Constitution of the Cons	\$0
Notes for DELAYED costs	- ANNUAL			iolation	ı is included with \	/lolation No. 3.	
, ,	ANNUAL			iolation	ı is included with \	/lolation No. 3. for one-time avoic	led-costs)- \$0
Notes for DELAYED costs Avoided Costs				enterii 0.00 0.00	n is included with \ ng item (except \$0 \$0	/iolation No. 3. for one-time avoid \$0 \$0	led costs): \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel	annuar			enteri) 0.00 0.00 0.00	n Is included with \ ng item (except \$0 \$0 \$0 \$0	for one-time avoid \$0 \$0 \$0 \$0	led costs) \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel	ANNUAL			enterii 0.00 0.00 0.00 0.00	n Is included with \ ng item (except \$0 \$0 \$0 \$0 \$0 \$0	/iolation No. 3. for one-time avoid \$0 \$0 \$0 \$0	## (## ## ## ## ## ## ##
Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling	ANNUAL			enterii 0.00 0.00 0.00 0.00 0.00	n Is included with \ ng item (except \$0	for one-time avoid \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs AVOIDED COSTS Disposal Personnel nspection/Reporting/Sampling Supplies/equipment	ANNUAL			enteri) 0.00 0.00 0.00 0.00 0.00	18 included with \ 18 item (except \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	/lolation No. 3. for one-time avoid	led.costs
Notes for DELAYED costs Avoided Costs Disposal Personnel respection/Reporting/Sampling Supplies/equipment Financial Assurance [2]	ANNUAL			enterii 0.00 0.00 0.00 0.00 0.00	n Is included with \ ng item (except \$0	for one-time avoid \$0 \$0 \$0 \$0 \$0 \$0	ded.costs) \$0 \$0 \$0 \$0 \$0 \$0

Compliance History Report

Customer/Respondent/Owner-Operator:

CN60086680

BP Products North America Inc.

Classification: AVERAGE

Rating: 5,68

Site Rating: 10.05

Regulated Entity:

ID Number(s):

RN102535077 8P PRODUCTS NORTH AMERICA

Classification: AVERAGE

INDUSTRIAL AND HAZARDOUS WASTE TXD008080533 EPA ID INDUSTRIAL AND HAZARDOUS WASTE SOLID WASTE REGISTRATION # 30139 (SWR) PERMIT INDUSTRIAL AND HAZARDOUS WASTE 50255 AIR NEW SOURCE PERMITS REGISTRATION 92956 AIR NEW SOURCE PERMITS REGISTRATION 92671 AIR NEW SOURCE PERMITS REGISTRATION 92587 AIR NEW SOURCE PERMITS REGISTRATION 92273 AIR NEW SOURCE PERMITS REGISTRATION 92585 AIR NEW SOURCE PERMITS REGISTRATION 92586 AIR NEW SOURCE PERMITS REGISTRATION 92692 AIR NEW SOURCE PERMITS PERMIT 1940 AIR NEW SOURCE PERMITS PERMIT 2231 AIR NEW SOURCE PERMITS PERMIT 2315 AIR NEW SOURCE PERMITS PERMIT 2529 AIR NEW SOURCE PERMITS PERMIT 2608 AIR NEW SOURCE PERMITS PERMIT 2612 AIR NEW SOURCE PERMITS PERMIT 2938 AIR NEW SOURCE PERMITS PERMIT 3758 AIR NEW SOURCE PERMITS PPRMIT 4714 AIR NEW SOURCE PERMITS PERMIT 6488 AIR NEW SOURCE PERMITS PERMIT 6592 PERMIT AIR NEW SOURCE PERMITS 6600 AIR NEW SOURCE PERMITS PERMIT 7085 AIR NEW SOURCE PERMITS PERMIT 9606 AIR NEW SOURCE PERMITS REGISTRATION 10060 AIR NEW SOURCE PERMITS REGISTRATION 10129 AIR NEW SOURCE PERMITS REGISTRATION 10156 AIR NEW SOURCE PERMITS REGISTRATION 10212 AIR NEW SOURCE PERMITS REGISTRATION 10597 AIR NEW SOURCE PERMITS REGISTRATION 11173 AIR NEW SOURCE PERMITS REGISTRATION 11175 AIR NEW SOURCE PERMITS REGISTRATION 11176 AIR NEW SOURCE PERMITS REGISTRATION 11787 AIR NEW SOURCE PERMITS REGISTRATION 13666 AIR NEW SOURCE PERMITS REGISTRATION 13667 AIR NEW SOURCE PERMITS REGISTRATION 15163 AIR NEW SOURCE PERMITS REGISTRATION 15271 AIR NEW SOURCE PERMITS REGISTRATION 15378 AIR NEW SOURCE PERMITS REGISTRATION 15436 AIR NEW SOURCE PERMITS REGISTRATION 15458 AIR NEW SOURCE PERMITS REGISTRATION 15497 AIR NEW SOURCE PERMITS REGISTRATION 15766 PERMIT AIR NEW SOURCE PERMITS 18506 AIR NEW SOURCE PERMITS PERMIT 19599 PERMIT AIR NEW SOURCE PERMITS 20850 AIR NEW SOURCE PERMITS PERMIT 22107 REGISTRATION AIR NEW SOURCE PERMITS 24608 AIR NEW SOURCE PERMITS REGISTRATION 24936 AIR NEW SOURCE PERMITS PERMIT 46052 REGISTRATION AIR NEW SOURCE PERMITS 46725 AIR NEW SOURCE PERMITS REGISTRATION 46724 AIR NEW SOURCE PERMITS PERMIT 47256 REGISTRATION AIR NEW SOURCE PERMITS 47563 AIR NEW SOURCE PERMITS REGISTRATION 47696 AIR NEW SOURCE PERMITS REGISTRATION 47956 AIR NEW SOURCE PERMITS REGISTRATION 47954 AIR NEW SOURCE PERMITS 48412 REGISTRATION AIR NEW SOURCE PERMITS REGISTRATION 49771 GB0004L AIR NEW SOURCE PERMITS ACCOUNT NUMBER AIR NEW SOURCE PERMITS REGISTRATION 84210 51875 AIR NEW SOURCE PERMITS REGISTRATION AIR NEW SOURCE PERMITS REGISTRATION 75507 AIR NEW SOURCE PERMITS REGISTRATION 56136 AIR NEW SOURCE PERMITS 4816700001 AFS NUM AIR NEW SOURCE PERMITS REGISTRATION 56657 AIR NEW SOURCE PERMITS PERMIT 49128 AIR NEW SOURCE PERMITS REGISTRATION 50798 72163 AIR NEW SOURCE PERMITS REGISTRATION AIR NEW SOURCE PERMITS REGISTRATION 54051 52467 AIR NEW SOURCE PERMITS REGISTRATION REGISTRATION 71839 AIR NEW SOURCE PERMITS

AIR NEW SOURCE PERMITS	REGISTRATION	53892
AIR NEW SOURCE PERMITS	REGISTRATION	54721
AIR NEW SOURCE PERMITS	REGISTRATION	55478
AIR NEW SOURCE PERMITS	REGISTRATION	87463
AIR NEW SOURCE PERMITS	EPA ID	PSDTX402
AIR NEW SOURCE PERMITS	REGISTRATION	76550
AIR NEW SOURCE PERMITS	REGISTRATION	78059
AIR NEW SOURCE PERMITS	REGISTRATION	78060
AIR NEW SOURCE PERMITS	REGISTRATION	78120
AIR NEW SOURCE PERMITS	REGISTRATION	77811
AIR NEW SOURCE PERMITS	REGISTRATION	78051
AIR NEW SOURCE PERMITS	REGISTRATION	89452
AIR NEW SOURCE PERMITS	REGISTRATION	79522
AIR NEW SOURCE PERMITS	REGISTRATION	81516
AIR NEW SOURCE PERMITS	REGISTRATION	81757
AIR NEW SOURCE PERMITS	REGISTRATION	82308
AIR NEW SOURCE PERMITS	REGISTRATION	87193
AIR NEW SOURCE PERMITS	REGISTRATION	87883
AIR NEW SOURCE PERMITS	REGISTRATION	84396
AIR NEW SOURCE PERMITS	REGISTRATION	84567
AIR NEW SOURCE PERMITS	REGISTRATION	88697
AIR NEW SOURCE PERMITS	REGISTRATION	85681
AIR NEW SOURCE PERMITS	REGISTRATION	88241
AIR NEW SOURCE PERMITS	REGISTRATION	91246
AIR NEW SOURCE PERMITS	REGISTRATION	90662
AIR NEW SOURCE PERMITS	REGISTRATION	89982
AIR NEW SOURCE PERMITS	REGISTRATION	87825
AIR NEW SOURCE PERMITS	REGISTRATION	86558
AIR NEW SOURCE PERMITS	REGISTRATION	84668
AIR NEW SOURCE PERMITS	REGISTRATION	84658
AIR NEW SOURCE PERMITS	REGISTRATION	85670
AIR NEW SOURCE PERMITS	REGISTRATION	83759
AIR NEW SOURCE PERMITS	REGISTRATION	84454
AIR NEW SOURCE PERMITS	REGISTRATION	86677
	REGISTRATION	83422
AIR NEW SOURCE PERMITS	REGISTRATION	87823
AIR NEW SOURCE PERMITS	REGISTRATION	83424
AIR NEW SOURCE PERMITS		83941
AIR NEW SOURCE PERMITS	REGISTRATION	90158
AIR NEW SOURCE PERMITS	REGISTRATION	91253
AIR NEW SOURCE PERMITS	REGISTRATION	87296
AIR NEW SOURCE PERMITS	REGISTRATION	92953
AIR NEW SOURCE PERMITS	REGISTRATION	WDW080
UNDERGROUND INJECTION CONTROL	PERMIT	WDW127
UNDERGROUND INJECTION CONTROL	PERMIT	WDW128
UNDERGROUND INJECTION CONTROL	PERMIT	WDW214
UNDERGROUND INJECTION CONTROL	PERMIT	WDW215
UNDERGROUND INJECTION CONTROL	PERMIT	
WASTE WATER GENERAL PERMIT	PERMIT	TXG670029
AIR OPERATING PERMITS	PERMIT	2657
AIR OPERATING PERMITS	ACCOUNT NUMBER	GB0004L
AIR OPERATING PERMITS	PERMIT	1541
AIR OPERATING PERMITS	PERMIT	2328
WASTEWATER	PERMIT	WQ0000443000
WASTEWATER	EPA ID	TX0003522
IHW CORRECTIVE ACTION	SOLID WASTE REGISTRATION # (SWR)	30139
AIR EMISSIONS INVENTORY	ACCOUNT NUMBER	GB0004L

Location:

2401 FIFTH AVENUE SOUTH BETWEEN 21ST AND 25TH STREETS, TEXAS CITY, GALVESTON COUNTY, TEXAS

September 08, 2005 to September 08, 2010

REGION 12 - HOUSTON TCEQ Region:

Date Compliance History Prepared:

September 08, 2010

Agency Decision Requiring Compliance History:

Compliance Period:

Enforcement

TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History (512) 239-2554 Lanae Foard Phone: Name:

Site Compliance History Components

1. Has the site been in existence and/or operation for the full five year compliance period?

Yes

2. Has there been a (known) change in ownership/operator of the site during the compliance period?

3. If Yes, who is the current owner/operator?

N/A OWNOPR

BP Products North America Inc.

OWNOPR

BP Amoco Texas City Business Unit

OWNOPR

BP Pipelines (North America) Inc.

4. If Yes, who was/were the prior owner(s)/operator(s)?

BP Amoco Chemical Company

BP Amoco Chemical Company

6. Rating Date: 9/1/2010 Repeat Violator: YES

Components (Multimedia) for the Site:

A. Final Enforcement Orders, court judgments, and consent decrees of the State of Texas and the federal government.

Effective Date: 11/06/2005

ADMINORDER 2004-2128-AIR-E

OPR

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)

5C THC Chapter 382, SubChapter A 362.085(b)

Rgmt Prov: TCEQ Air Permit #8810, SC #1 PERMIT

Description: Failed to comply with permitted emissions limits.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.110(a)

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: No. 19599, Special Condition No.1, PERMIT

Description; Allowed unauthorized emissions,

Classification; Minor

Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)

30 TAC Chapter 101, SubChapter F 101.211(a)

5C THC Chapter 382, SubChapter A 382.085(b)

Description: Falled to submit a proper emission event report for an emission event that occurred from October 29, 2003 to November 14, 2003 in the fugitive components (EPN F-380-SRU-FUG) in the Sulfur Recovery Unit.

Effective Date: 12/30/2005

ADMINORDER 2005-0818-AIR-E

Classification: Moderate

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382,085(b)

Romt Prov: #18706, Special Condition No.1 PERMIT Description: Failed to comply with permitted emissions limits.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382,085(b)

Rqmt Prov: Special Condition No. 1 PERMIT

Description: Failed to comply with permitted emissions limits.

Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter F 101.211(a)

5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to report an emission event.

Effective Date: 03/06/2006

Citation:

ADMINORDER 2005-0706-AIR-E

Classification: Moderate

30 TAC Chapter 116, SubChapter B 116.110(a)

5C THC Chapter 382, SubChapter A 382.085(b)

Description: Allowed unauthorized emissions.

Effective Date: 06/15/2006

ADMINORDER 2005-0224-AIR-E

Classification: Moderate

Citation: 30 TAC C

30 TAC Chapter 101, SubChapter A 101.20(3)

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382,085(b)

Rqmt Prov: TCEQ Air Permit #8810, SC1 PERMIT

Description: Failed to comply with permitted emissions limits for Flare 381, SRU Incinerator Stack 384, and Flare

383.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov; General Conditions F and G PERMIT

No.18707, Special Condition #1 PERMIT

Description: Failed to comply with permitted emission limits for the Fluid Catalytic Cracking Unit (EPN 334).

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Rgmt Prov: General Conditions F and G PERMIT

TCEQ Air Permit No.18707, SC #1 PERMIT

Description: Failed to comply with permitted emission limits for the Fluid Catalytic Cracking Unit (EPN 321).

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116,115(b)

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382,085(b)

Rqmt Prov: 20982 Special Condition 1 PERMIT

General Condition G PERMIT

Description: Failed to comply with permitted emission limits for the Coker Resid De-Asphalting Unit and Cooling

Tower (EPN 412).

Classification: Moderate

30 TAC Chapter 116, SubChapter B 116,115(b) Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382,085(b)

Rgml Prov; General Conditions F and G and SC 1 PERMIT

Description: Failed to comply with permitted emission limits for Flare # 3 (EPN F-200) in the Ultracracker Unit.

Classification; Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)

30 TAC Chapter 111, SubChapter A 111.111(a)(1)(C)

30 TAC Chapter 116, SubChapter B 116,115(b) 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b)

Romt Prov: 8810 Special Condition 1 PERMIT

General Conditions F and G PERMIT

Description: Failed to comply with permitted emission limits for the SRU (EPN 384).

Classification: Moderate

30 TAC Chapter 101, SubChapter A 101.20(3) Citation:

30 TAC Chapter 111, SubChapter A 111.111(a)(1)(C)

30 TAC Chapter 116, SubChapter B 116.115(b) 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b)

Romt Prov: 8810 Special Condition 1 PERMIT

General Conditions F and G PERMIT

Description: Failed to comply with permitted emission limits for the SRU (EPN 384):

Classification: Moderate

30 TAC Chapter 101, SubChapter A 101.20(3)

30 TAC Chapter 111, SubChapter A 111.111(a)(1)(C)

30 TAC Chapter 116, SubChapter B 116.115(b) 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b)

Romt Prov: 8810 Special Condition 1 PERMIT

General Conditions F and G PERMIT

Description: Failed to comply with permitted emission limits for the SRU (EPN 384).

Classification: Moderate

30 TAC Chapter 101, SubChapter A 101.20(3)

30 TAC Chapter 111, SubChapter A 111.111(a)(1)(C)

30 TAC Chapter 116, SubChapter B 116.116(b). 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b)

Rgmt Prov: 8810 Special Condition 1 PERMIT

General Conditions F and G PERMIT

Description: Failed to comply with permitted emission limits for the SRU (EPN 384).

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)

30 TAC Chapter 116, SubChapter B 116.115(b)

30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b)

Rgml Prov: Air Permit No. 8810, SC #1, PERMIT

General Conditions F and G PERMIT

Description: Failed to comply with permitted emission limits for the RHU 200 Reactor Train (EPN 501).

Classification: Moderate

30 TAC Chapter 116, SubChapter B 116.115(b)

30 TAC Chapter 116, SubChapter B 116,115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: 2612 Special Condition #1 PERMIT

General Condition F PERMIT

Description: Failed to comply with permitted emission limits for the Aromatics Recovery Unit 2 (EPN-611).

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)

30 TAC Chapter 116, SubChapter B 116,115(b)

30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382,085(b)

Rqmt Prov: General Conditions F and G PERMIT

No. 8810 Special Condition #1, PERMIT

Description: Failed to comply with permitted emission limits for the RHU 200 Reactor Train (EPN 501).

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101,20(3)

30 TAC Chapter 116, SubChapter B 116.115(b)

30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382,085(b)

Rqmt Prov: General Conditions F and G PERMIT

No. 8810 Special Condition #1, PERMIT

Description: Failed to comply with permitted emission limits for the RHU 200 Reactor Train (EPN 501).

Classification; Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)

30 TAC Chapter 116, SubChapter B 116.115(b)

30 TAC Chapter 116, SubChapter B 116,115(c) 5C THC Chapter 382, SubChapter A 382,085(b)

Rgmt Prov; General Conditions F and G PERMIT

Description: Failed to comply with permitted emission limits for the 400 Reactor Train (EPN 501).

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)

30 TAC Chapter 101, SubChapter F 101.201(a)(2)(G)

5C THC Chapter 382, SubChapter A 382,085(b)

Description: BP Products failed to notify the TCEQ within 24 hours of an emissions event.

Classification: Major

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)

30 TAC Chapter 116, SubChapter B 116.115(b)

30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382,085(b)

Rqmt Prov: General Conditions F and G PERMIT

TCEQ Air Permit No. 8810, SC No. 1 PERMIT

Description: Failed to comply with permitted emission limits for the RHU 300 Reactor Train (EPN 501).

Classification: Major

Citation; 30 TAC Chapter 116, SubChapter 8 116.115(b)

30 TAC Chapter 116, SubChapter 8 116.115(c)

5C THC Chapter 382, SubChapter A 382,085(b)

Rqmt Prov: General Conditions F and G PERMIT

Special Condition No. 1 PERMIT

Description: Failed to comply with permitted emission limits for the Ultracracker Flare (EPN 351) and the Ultraformer

Unit (EPN F-160).

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)

30 TAC Chapter 116, SubChapter B 116,115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Rgmt Prov: TCEQ Permit No. 8810, SC #1 PERMIT

Description: Failed to comply with permitted emissions limits for the CFH/RHU Flare,

Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter F 101,211(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to timely submit the final notification for a shutdown event,

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382,085(b)

Rgmt Prov: No. 8810 and PSD-TX-402M2, S.C. No. 1 PERMIT

Description: Failed to comply with permitted emissions limits for the CFH/RHU Flare.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: No. 8810, Special Condition No. 1 PERMIT

Description: Failed to comply with permitted emissions limits for the CPR II Flare.

Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)

30 TAC Chapter 101, SubChapter F 101.201(b)(8)

5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to submit a complete emissions event report for an emissions event that occurred on September

25, 2004,

Classification: Minor

Cilation:

30 TAC Chapter 101, SubChapter F 101.201(b)(8)

5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to properly report an emissions event that occurred on February 8, 2003,

Classification: Moderate

Citation:

30 TAC Chapter 101, SubChapter A 101.20(3)

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Rgmt Proy: No. 8810, Special Provision No. 1 PERMIT

Description: Failed to comply with permitted emissions limits for the CRP II Flare.

Classification: Moderate

Citation:

30 TAC Chapter 122, SubChapter B 122.142(a)

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THC Chapter 382, SubChapter A 382,085(b)

Rgmt Prov: Compliance Plan and Schedule OP

Description: Failed to perform an applicability determination and compliance review.

Classification: Major

Citation:

30 TAC Chapter 122, SubChapter B 122.142(a)

30 TAC Chapter 122, SubChapter B 122,143(4)

5C THC Chapter 382, SubChapter A 382.085(b)

Romt Prov: Compliance Plan and Schedule OP

Description: Failure to install monitoring equipment or obtain an alternate means of compliance.

Classification: Minor

Citation:

30 TAC Chapter 122, SubChapter B 122.145(2)(A)

5C THC Chapter 382, SubChapter A 382.085(b)

Rgmt Prov: General Terms and Conditions OP

Description: Falled to submit a complete semiannual deviation report.

Effective Date: 07/22/2006

ADMINORDER 2005-1027-AIR-E

Classification: Moderate

litation:

5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to prevent the emission of unauthorized air contaminants during Incident No. 20972.

Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Rgmt Prov: No. 8810, Special Condition No. 1 PERMIT

Description: Failed to maintain emission rates of sulfur dioxide (SO2) and nitrogen oxides (NOx) below the Maximum Allowable Emission Rates (MAER; 0.2 pounds per hour (lbs/hr) for SO2, 0.8 lbs/hr for NOx) during incident No.

48135.

Classification: Minor

Citation:

30 TAC Chapter 101, SubChapter F 101.201(a)(1)

5C THC Chapter 382, SubChapter A 382.085(b)

Description: Falled to determine if an emissions event was reportable, and failed to submit the initial emissions event report, within 24 hours after discovery (Incident No. 48847).

Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: No. 8810, Special Condition No. 1 PERMIT

Description: Failed to maintain emission rates of SO2 below the Maximum Allowable Emission Rates (MAER; 0.2 lbs/hr) during incident No. 48847.

Effective Date: 08/28/2006

ADMINORDER 2006-0196-AIR-E

Classification: Moderate

Citation: 5C THC Chapter 382, SubChapter A 382,085(b)

Description: Allowed unauthorized emissions,

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)

30 TAC Chapter 116, SubChapter G 116,715(a)

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: No. 47256, Special Condition No. 1 PERMIT Description: Failed to comply with permitted emissions limits.

Classification: Major

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)

30 TAC Chapter 116, SubChapter G 116.715(a)

5C THC Chapter 382, SubChapter A 382,085(b)

Rqmt Prov: NSR Permit #47256, SC #1 PA

Special Condition 15 PERMIT

Description: Failed to comply with permitted emissions limits

Classification: Major

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)

30 TAC Chapter 116, SubChapter G 116,715(a)

5C THC Chapter 382, SubChapter A 382.085(b)

Rgmt Prov: NSR Permit #47256, Special Condition #1 PA

Special Condition 15 PERMIT

Description: Failed to comply with permitted emissions limits.

Effective Date: 09/21/2006 AOMINORDER 2005-0262-AIR-E

Classification: Moderate

Citation:

Moderale

30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Rgmt Prov: 8810 & PSD-TX-402M2, Special Condition 1 PERMIT

Description: Failed to comply with permitted emissions limits.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101,20(3)

30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 116, SubChapter B 116.116(b)(1) 5C THC Chapter 382, SubChapter A 382.085(b)

Rgmt Proy: 19599, Special Condition No. 1 PERMIT

Description: Failed to comply with permitted emissions representations.

Effective Date: 09/21/2006

ADMINORDER 2006-0310-AIR-E

Classification: Moderate

Citation: 5C THC Chapter 382, SubChapter A 382.085(a)
Description: BP Products allowed unauthorized emissions

Classification: Moderate

30 TAC Chapter 101, SubChapter A 101,20(3)

30 TAC Chapter 116, SubChapter G 116.715(a)

5C THC Chapter 382, SubChapter A 382,085(b)

Rqmt Prov: Flexible Permit #47256, SC#1 PERMiT

Description: BP Products failed to comply with permitted emissions limits

Effective Date: 10/19/2006

Citation:

ADMINORDER 2006-0400-AIR-E

Classification: Moderate

30 TAC Chapter 116, SubChapter B 116.115(c)

Remt Prov: TCEQ Air Permit No. 6488, SC2 PERMIT

Description: failed to comply with permitted emissions limits. Specifically, the emissions limit for VOCs is 1.5 lbs/hr, and beginning September 8, 2003, the cooling tower (EPN 422) emitted 69,063 pounds of VOCs over a 702 hour

period

Effective Date: 11/18/2006

ADMINORDER 2006-0557-AIR-E

Classification: Moderate

5C THC Chapter 382, SubChapter A 382.085(a)

Description: Failed to control unauthorized emissions during an excessive emissions event which began on

September 9, 2004 in the Power Station No. 2 Unit.

Effective Date: 12/02/2006

ADMINORDER 2006-0099-AIR-E

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.110(a)

5C THC Chapter 382, SubChapter A 382.0518(a)

5C THC Chapter 382, SubChapter A 382.085(b)

Description: Allowed unauthorized emissions.

Effective Date: 05/11/2007 ADMINORDER 2005-1839-AIR-E

Classification: Moderate

Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(1)(A)

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382,085(b)

Spec. Cond No. 1 PERMIT Ramt Prov:

Spec. Cond. No. 1 PERMIT

Description: Failed to prevent the unauthorized release of air contaminants into the atmosphere, and failed to

maintain opacity at 30% averaged over a six-minute period.

Classification: Moderate

30 TAC Chapter 101, SubChapter A 101,20(2)

30 TAC Chapter 115, SubChapter D 115.352(4)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)

5C THC Chapter 382, SubChapter A 382,085(b)

Description: Failed to equip an open-ended line with a cap, blind flange, plug, or a second valve.

Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.116(a)

5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to prevent the unauthorized release of air contaminants into the atmosphere.

Effective Date: 07/09/2009

ADMINORDER 2007-1919-IHW-E

Classification: Major

30:TAC Chapter 335, SubChapter A 335.2(b)

30 TAC Chapter 335, SubChapter O 335.431(c)(1)

40 CFR Chapter 268, SubChapter I, PT 268, SubPT A 268.9(c) 40 CFR Chapter 268, SubChapter I, PT 268, SubPT D 268.40(e)

Rgmt Prov: II.A.7. PERMIT

Description: Failure to prevent the land disposal of characteristically hazardous waste not meeting applicable

treatment standards at two unauthorized facilities.

Classification: Moderate

30 TAC Chapter 335, SubChapter O 335.431(c)(1)

40 CFR Chapter 268, SubChapter I, PT 268, SubPT A 268,7(a)(2)

Ramt Prov: II.A.7, PERMIT

Description: Failure to provide land disposal restriction notices to the land treatment facility and landfill along with the

initial shipments of hazardous amine reclaimer boltoms to those facilities.

Classification: Moderate

30 TAC Chapter 335, SubChapter A 335,6(c) Citation:

Rgmt Prov: II.C.1.h. PERMIT

Description: Failure to maintain an up-to-date Notice of Registration.

Classification: Moderate

30 TAC Chapter 335, SubChapter A 335.9(a)(2)

Ramt Prov: II.C.1.h. PERMIT

Description: Failure to report the amount of hazardous amine reclaimer bottoms generated in Calendar Years 2004

and 2006

Classification: Moderate

30 TAC Chapter 335, SubChapter A 335.10(c)

40 CFR Chapter 262, SubChapter I, PT 262, SubPT B 262.20(a)(1)

Romt Prov: II.C.1.h. PERMIT

Description: Failure to correctly complete uniform hazardous waste manifests for nine shipments of hazardous waste

to Gulf West Landfill Texas.

Classification: Moderate

30 TAC Chapter 335, SubChapter C 335.62

30 TAC Chapter 335, SubChapter R 335.504

40 CFR Chapter 262, SubChapter I, PT 262, SubPT A 262.11

Description: Failure to make a complete and correct hazardous waste determination for amine reclaimer bottoms.

Effective Date: 07/20/2009

ADMINORDER 2008-1398-IHW-E

Classification: Major

30 TAC Chapter 335, SubChapter A 335.2(b)

Description: The facility failed to prevent an unauthorized shipment of hazardous waste stream 9022603H, EPA Code F038, stored in a vacuum box VB 1029, to the nonhazardous waste facility, Coastal Plains Landfill, Alvin, Texas,

B. Any criminal convictions of the state of Texas and the federal government.

Conviction Date: 3/12/2009 12:00:00AM

Type of Action: COURTORDER

Classification; Major

Romt Proy:

Citation:

42 USC Chapter 85 Subchapter I 85.7413(c)(1)

Description: The charges where based on the catastrophic explosion that occurred on March 23, 2005 at the Texas City refinery, which resulted in the death of fifteen contract workers and injuries of over 170 others. BP admitted from 1999 up until the morning of March 23, 2005, several procedures required by the Clean Air Act for ensuring the mechanical integrity and a safe startup had either not been established or were being ignored.

C. Chronic excessive emissions events.

N/A

D. The approval dates of investigations, (CCEDS Inv. Track. No.)

1 09/14/2005 (403367) (406870) 2 09/14/2005 3 09/15/2005 (260589) 4 09/15/2005 (377149) 5 09/15/2005 (418585) 6 09/16/2005 (285680)7 09/16/2005 (380788)8 09/16/2005 (406970) 9 09/19/2005 (404902) 10 09/19/2005 (440653)11 09/22/2005 (440654)12 09/22/2005 (440655) 13 09/23/2005 14 09/27/2005 (394338)15 10/07/2005 (393826) 10/11/2005 16 (432303)17 10/12/2005 (252191)(433061) 18 10/12/2005 19 10/12/2005 (433072) (432968)11/17/2005 11/21/2005 11/21/2005 12/05/2005 12/05/2005

20 11/15/2005 21 (407011) (468150) 22 23 (468152) (432348)24 25 (434122)26 12/08/2005 (438708)27 12/15/2005 (436991) 28 12/19/2005 (468151) 29 01/20/2006 (433636) 30 01/24/2006 (451779) 31 01/24/2006 (451782) 32 01/24/2006 (451783) 33 01/30/2006 (453068) 34 02/15/2006 (436815) 35 02/16/2006 (436510)36 02/16/2006 (436874)37 02/16/2006 (450859) 38 02/17/2006 (450896) 39 02/21/2006 (438502)40 02/22/2006 (406484) 41 02/22/2006 (431649) 42 02/22/2006 (436096)02/22/2008 (468147) 43 02/23/2006 (438893)44 45 02/27/2006 (431613)02/27/2006 (431717) 46 47 02/28/2006 (280636) 48 02/28/2006 (405531) (405832)49 03/13/2006 03/16/2006 50 (450739)51 03/16/2006 (498014)52 03/21/2006 (259596) 53 04/17/2006 (468148)54 04/17/2006 (468149) 55 05/05/2006 (345041)(463181) 56 05/12/2006 57 05/12/2006 (463184)

58

59

05/12/2006

05/15/2006

05/16/2006

(463185) (498015)

(465072)

61	05/16/2006	(465202)
62	05/16/2006	(465220)
63	05/17/2006	(400694)
64	05/18/2006	-
		(264757)
65	05/18/2006	(264800)
66	05/31/2006	(464272)
67	05/31/2006	(480291)
68	06/15/2006	(481429)
69	06/16/2006	(480900)
70	06/19/2006	(498016)
71	06/28/2006	(464246)
72	06/30/2006	(481539)
73	07/07/2006	(437544)
74	07/07/2006	(464259)
75	07/07/2006	(467173)
76	07/18/2006	(467291)
77	07/19/2006	(480929)
78	07/20/2006	(486378)
	07/20/2006	(486387)
79	0772072000	(400301)
80	07/20/2006	(486394)
81	07/27/2006	(483807)
82	08/15/2006	(281937)
83	08/18/2006	(482275)
84	08/21/2006	(520031)
85	08/25/2006	(463821)
86	08/25/2006	(488981)
87	08/27/2006	(510161)
88	08/31/2006	(497518)
89	08/31/2006	(497522)
90-	08/31/2006	(497527)
91	09/01/2006	(481204)
92	09/05/2006	(509936)
93	09/12/2006	(680415)
94	09/15/2006	(520032)
95	09/21/2006	(530965)
96	09/25/2006	(512306)
97	09/28/2006	(512567)
98	10/24/2006	(544278)
99	11/15/2006	(517680)
100	11/21/2006	(518972)
101	11/21/2006	(518980)
102	11/21/2006	(518985)
103	11/21/2006	(544279)
104	12/08/2006	(517101)
105	12/19/2006	(532956)
106	12/19/2006	(544280)
107	01/05/2007	(531855)
108	01/16/2007	(534109)
109	01/22/2007	(544281)
110	01/26/2007	(534737)
111	01/31/2007	(457489)
112	01/31/2007	(513272)
113	02/09/2007	(509890)
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446
      06/30/2010
                        (828027)
      07/02/2010
                        (801675)
447
448
      07/02/2010
                        (824711)
449
      07/06/2010
                        (802659)
450
      07/09/2010
                        (824714)
      07/09/2010
                        (825992)
451
452
      07/09/2010
                        (829457)
453
      07/16/2010
                        (841421)
      07/23/2010
                        (708695)
454
455
      07/23/2010
                        (708933)
456
      08/06/2010
                        (790164)
      08/17/2010
                        (841043)
457
458
      08/18/2010
                        (849412)
459
      08/20/2010
                        (830265)
460
      08/30/2010
                        (844232)
      08/30/2010
461
                        (844247)
462
      08/30/2010
                        (844251)
463
      09/01/2010
                        (827055)
      09/01/2010
                        (827166)
464
      09/01/2010
465
                        (827181)
466
      09/01/2010
                        (844449)
467
      09/01/2010
                        (848819)
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Written notices of violations (NOV), (CCEDS Inv. Track. No.)

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Date:
        09/14/2005 (406870)
Self Report? NO
                                                      Classification:
                                                                        Moderate
              30 TAC Chapter 111, SubChapter A 111.111(a)(1)(A)
Citation:
 30 TAC Chapter 116, SubChapter B 116.115(c)
 5C THC Chapter 382, SubChapter A 382.085(b)
 Special Condition 7 PERMIT
Description: Failure to maintain steady catalyst circulation rates while the unit was operating at
              reduced throughput.
Date: 09/14/2005 (403367)
                                                       Classification:
                                                                        Moderate
Self Report? NO
Citation:
              2610, Special Condition No. 1 PERMIT
 30 TAC Chapter 116, SubChapter B 116.115(c)
 5C THC Chapter 382, SubChapter A 382,085(b)
Description: Failure to prevent an avoidable emissions event.
Date: 09/15/2005 (418585)
                                                       Classification:
Self Report? NO
                                                                        Moderate
              30 TAC Chapter 116, SubChapter B 116,115(c)
Citation
 5C THC Chapter 382, SubChapter A 382.085(b)
 No. 6488, Special Condition No. 2 PERMIT
Description; BP failed to prevent a leak from the short loop in the regeneration system.
Date: 09/16/2005 (406970)
Self Report? NO
                                                       Classification;
                                                                        Moderate
              30 TAC Chapter 111, SubChapter A 111.111(a)(1)(A)
Citation:
 5C THC Chapter 382, SubChapter A 382.085(b)
Description: Fallure to maintain proper catalyst aeration and catalyst circculation.
                                                       Classification:
                                                                        Minor
```

Self Report?

Citation: Description: 30 TAC Chapter 101, SubChapter F 101,201(g)

BP failed to submit a written Initial Notification for Incident # 55146 to the TCEQ within 24

hours of discovery of the incident.

12/05/2005 (434122) CN600866800 Date:

Classification: Self Report?

30 TAC Chapter 116, SubChapter G 116,715(a) Citation: 5C THC Chapter 382, SubChapter A 382,085(b)

No. 47256, Special Condition No. 1, PERMIT

Description BP failed to prevent an avoidable emissions event,

12/05/2005 (432348) Date:

Self Report? Classification: Moderate

Moderate

30 TAC Chapter 116, SubChapter B 116.115(c) Citation: 5C THC Chapter 382, SubChapter A 382,085(b)

No. 2612, Special Condition No. 1 PERMIT

BP falled to prevent an AU2 Flare shutdown and benzene release to the atmosphere. Description

12/15/2005 (437544) Date: CN600866800

Self Report? Classification: 30 TAC Chapter 111, SubChapter A 111.111(a)(1)(B)

Citation

Description: BP Products North America Texas City failed to prevent the electrostatic precipitator trip

which resulted in an opacity greater than 20%.

Self Report? Classification: Moderate

30 TAC Chapter 116, SubChapter G 116,715(a) Citation

5C THC Chapter 382, SubChapter A 382.085(b) No. 47256, Special Condition No. 1 PERMIT

BP Products North America Texas City failed to prevent the electrostatic precipitator trip: Description:

Date: 12/15/2005 (436991) CN600866800

Classification: Moderate Self Report?

30 TAC Chapter 116, SubChapter G 116.715(a) Citation:

5C THC Chapter 382, SubChapter A 382,085(b)

No. 47256, Special Condition No. 1 PERMIT BP failed to prevent an avoidable emissions event. Description

(510161) 06/16/2008 CN600866800 Date:

Self Report? Classification: Minor

30 TAC Chapter 305, SubChapter F 305.121 Citation: Self-reporting Requirements PERMIT

Using unapproved self-generated Discharge Monitoring Report (DMR) forms to report Description:

monitorina results.

Date: 06/28/2006 (464246)

Self Report? Classification: Moderate

30 TAC Chapter 116, SubChapter G 116.715(a) Citation: 5C THC Chapter 382, SubChapter D 382.085(b) No. 47256, Special Condition No. 1 PERMIT

BP failed to prevent a malfunction of pressure relief valve (RV811M). Description:

Date: 07/07/2006 (467173)

Classification: Self Report? Minor

30 TAC Chapter 101, SubChapter F 101.223(a)(1) Citation: 5C THC Chapter 382, SubChapter D-382.085(b)

Description: BP failed to submit a CAP in a timely manner.

(464259) Date: 07/07/2006

Classification: Moderate Self Report?

Citation: 30 TAC Chapter 116, SubChapter G 116,715(a)

47256 Special Condition 48 PERMIT

5C THC Chapter 382, SubChapter D 382:085(b)

Description: BP failed to conduct an extended dry out procedure in the B-302 furnace before starting up

the unit.

(463821) 08/29/2006 Date:

Classification: Moderate Self Report?

Citation: 30 TAC Chapter 116, SubChapter G 116.715(a) 5C THC Chapter 382, SubChapter D 382,085(b)

No. 47256, Special Condition No. 1 PERMIT

BP failed to prevent a release from pressure relief valve (RV828). Description:

(530965) 09/21/2006 Date:

Self Report? Classification: Moderate

30 TAC Chapter 305, SubChapter F 305.125(1) Citation: 30 TAC Chapter 305, SubChapter F 305,125(17)

NON-RPT VIOS FOR MONIT PER OR PIPE Description:

Date: 03/28/2007 (540156)

Classification: Self Report? NO Moderate

2612, Special Condition No. 1 PERMIT Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter D 382.085(b) BP failed to meet the affirmative defense for the emissions event Description:

Classification: Minor Self Report?

30 TAC Chapter 101, SubChapter F 101.201(f) Citation:

BP failed to provide requested information by the deadline. Description:

NO Classification: Self Report? Minor

Citation: 30 TAC Chapter 101, SubChapter F 101.201(b)(1)(H)

BP failed to identify the authorization number of the standard permit governing the facilities Description:

involved in the emissions event.

03/30/2007 (542920) Date: CN600866800 Self Report? NO Classification: Minor Citation: 30 TAC Chapter 101, SubChapter F 101.201(f) BP Products North America Texas City failed to provide an analysis of the probable causes Description: of emissions event No. 82575 in a timely manner. Self Report? NO Classification: Moderate 30 TAC Chapter 116, SubChapter G 116,715(a) Citation 5C THC Chapter 382, SubChapter D 382,085(b) No. 47256, Special Condition No. 1 PERMIT Description: BP Products North America Texas City failed to prevent a pipeline leak at Tank Storage No. 105 04/20/2007 (556064) Date: CN600866800 Self Report? Classification: NO 30 TAC Chapter 101, SubChapter F 101.201(f) Citation: BP Products North America Texas City failed to provide an analysis of the probable causes Description: of Incident No. 85818 by March 12, 2007. Self Report? Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter G 116.715(a) 47256 SC 1 PERMIT 5C THC Chapter 382, SubChapter D 382.085(b) Description BP Products North America Texas City failed to prevent a heat exchanger leak. Date: 04/30/2007 (574933) CN600866800 Self Report? Classification: Moderate 30 TAC Chapter 305, SubChapter F 305,125(1) Citation TWC Chapter 26 26.121(a) Failure to meet the limit for one or more permit parameter Description: 05/31/2007 (574934) Date: Classification: Self Report? Citation: 30 TAC Chapter 305, SubChapter F 305,125(1) TWC Chapter 26 26,121(a) Failure to meet the limit for one or more permit parameter Description: (556477) Date: 05/31/2007 CN600866800 Classification: Moderate Self Report? 30 TAC Chapter 111, SubChapter A 111.111(a)(1)(E) Citation: 30 TAC Chapter 116, SubChapter G 116.715(a) 5C THC Chapter 382, SubChapter D 382.085(b) No. 47256, Special Condition No. 38 PERMIT BP Products North America Texas City failed to prevent a circuit breaker trip causing a Description: temporary shutdown in the Fluid Catalyst Cracking Unit No. 3, electrostatic precipitator 06/06/2007 (556814) Date: Moderate Self Report? Classification: Citation: 30 TAC Chapter 101, SubChapter A 101.4 Release of catalyst adversely affecting human health and property Description: 08/29/2007 (543546) CN600866800 Date: Classification: Moderate Self Report? NO 30 TAC Chapter 122, SubChapter B 122.143(4) Citation: 30 TAC Chapter 122, SubChapter B 122,145(2)(A) 5C THC Chapter 382, SubChapter D 382,085(b) Description: Failure to include a deviation on the deviation report within its certification period. Classification: Self Report? Moderate Citation: 30 TAC Chapter 117, SubChapter B 117,213(c)(1)(G) 30 TAC Chapter 122, SubChapter B 122.143(4) 30 TAC Chapter 122, SubChapter B 122.147(a)(1) 5C THC Chapter 382, SubChapter D 382.085(b) FOP O-02328 Special Condition 16 OP FOP O-02328 Special Condition 1A OP NSR 47256 Special Condition 63 PERMIT NSR 47256 Special Condition 63C PERMIT Description: Failure to install NOx CEMS on thermal oxidizers. Classification: Self Report? 30 TAC Chapter 122, SubChapter B 122.132(e)(2)(A) Citation: 5C THC Chapter 382, SubChapter D 382.085(b) Description:

Moderate Failure to include the applicable requirements for CEMS on thermal oxidizer in Title V O-02328 Classification: Moderate NO 30 TAC Chapter 115, SubChapter D 115.352(4)

Moderate

Self Report? Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 122, SubChapter B 122,143(4) 40 CFR Part 60, Subpart VV 60,482-6 5C THC Chapter 382, SubChapter D 382,085(b) FOP 0-02328 Special Condition 16 OP FOP Ω-02328 Special Condition 1A OF NSR 47256 Special Condition 17E PERMIT

Failure to close open-ended lines containing VOCs. (Category C10) Description: Classification:

Self Report?

30 TAC Chapter 122, SubChapter B 122.132(e)(2)(A) Citation:

5C THC Chapter 382, SubChapter D 382.085(b)

Description: Failure to Include NESHAP subpart FF requirements for dock sumps in Title V Permit O-

Self Report? NΩ 30 TAC Chapter 122, SubChapter B 122.132(e)(2)(A) Citation:

5C THC Chapter 382, SubChapter D 382,085(b)

Failure to include NSPS subpart J requirements in Title V Permit 0-02328. Description:

08/31/2007 Date:

(601493) CN600866800

Self Report?

Classification;

2D TWC Chapter 26, SubChapter A 26.121(a) Citation:

30 TAC Chapter 305, SubChapter F 305,125(1)

Description: 09/30/2007

Failure to meet the limit for one or more permit parameter (619401)

Self Report?

CN600866800 Classification:

Citation: 2D TWC Chapter 26, SubChapter A 26,121(a)

30 TAC Chapter 305, SubChapter F 305,125(1) Failure to meet the limit for one or more permit parameter Description:

(596361) 10/23/2007 Date:

Self Report? Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter D 382.085(b)

No. 2231, Special Condition No. 1 PERMIT

BP failed to prevent a corrosion leak in line 166 of Tank 30 which resulted in the release of Description:

18 pounds (lbs.) of un authorized air contaminants to the atmosphere,

10/24/2007 Date:

Self Report? NO Classification: Moderate

Classification:

Minor

Moderate

Classification:

Moderate

Moderate

Moderate

Citation: 30 TAC Chapter 116, SubChapter G 116.715(a)

5C THC Chapter 382, SubChapter D 382.085(b) No. 47256, Special Condition #1 PERMIT

Description: BP failed to prevent non condensable vapors from collecting in the overhead space of the

F-630 reflux drum causing a release in Aromatics Unit No.2, at Flare No.2.

Self Report? NO

Citation:

Citation:

Citation:

30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)

BP falled to submit the initial notification within 24 hours after the discovery of the emissions Description:

Self Report? NO Classification: Minor

30 TAC Chapter 101, SubChapter F 101.201(b)(1)(H) Citation:

Description BP failed to include the authorization number or permit in the final notification submitted to

the TCEQ.

10/31/2007 Date:

(619402) CN600866800

Classification: Self Report? Moderate

2D TWC Chapter 26, SubChapter A 26.121(a) Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)

Failure to meet the limit for one or more permit parameter Description: 12/31/2007 (619404) Date: CN600866800

Self Report? Classification: Moderate

30 TAC Chapter 305, SubChapter F 305.125(1)

Failure to meet the limit for one or more permit parameter Description:

01/31/2008 Date: CN600866800

Self Report? Classification

2D TWC Chapter 26, SubChapter A 26,121(a)

2D TWC Chapter 26, SubChapter A 26.121(a) Citation:

30 TAC Chapter 305, SubChapter F 305.125(1)

Failure to meet the limit for one or more permit parameter Description:

Date: 02/15/2008 (617082)

Classification: Self Report? Moderate

5C THSC Chapter 382 382 085(b)

TCEQ Air Flexible Permit #47256, SC#1 PA

failed to prevent a leak on a tubing connection to the process piping. Description:

30 TAC Chapter 116, SubChapter G 116.715(a)

02/29/2008 (671907) Date:

Classification: Self Report? Moderate

2D TWC Chapter 26, SubChapter A 26,121(a) Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)

Failure to meet the limit for one or more permit parameter Description:

Date: 03/13/2008 (616996)

Classification: Self Report? Moderate

30 TAC Chapter 116, SubChapter B 116.115(c) Citation:

5C THSC Chapter 382 382,085(b)

TCEQ Air Permit No. 2231, SC #1 PERMIT

Description: BP failed to prevent a transfer line leak due to overpressuring.

03/31/200B (671908) CN600866800 Date:

Classification: Moderate Self Report? 2D TWC Chapter 26, SubChapter A 26.121(a) Citation:

30 TAC Chapter 305, SubChapter F 305.125(1)

Failure to meet the limit for one or more permit parameter Description:

Date: 05/19/2008 (654255)

Self Report? Classification: Minor Citation:

30 TAC Chapter 101, SubChapter F 101,223(a)(1)

Description: Date:

05/30/2008

BP Products failed to submit a CAP in a timely manner. (612170)

Self Report? Citation

30 TAC Chapter 116, SubChapter G 116 715

5C THSC Chapter 382.382.085(b)

No. 47256, Special Condition No. 1 PERMIT

Description:

BP failed to prevent a trip of the J-425 compressor.

Self Report?

Citation Description 30 TAC Chapter 101, SubChapter F 101,201(a)(1)(B) BP failed to submit the initial notification within 24 hours of discovery

06/02/2008 Date:

(641430)

Self Report?

30 TAC Chapter 101, SubChapter A 101.4

Citation: Description:

Violation of 30 TAC 101.4, which states that no person shall discharge from any source whatsoever one or more air contaminants or combinations thereof, in such concentration and of such duration as are or may tend to be injurious to or to adversely affect human

health or welfare, animal life, vegetation, or property,

or as to interfere with the normal use and enjoyment of animal life, vegetation, or property.

06/25/2008

(654767)

Self Report?

Citation

30 TAC Chapter 101, SubChapter A 101.4

Description:

This constitutes a violation of 30 TAC 101.4, which states that no person shall discharge from any source whatsoever one or more air contaminants or combinations thereof, in such concentration and of such duration as are or may tend to be injurious to or to adversely affect human health or welfare, animal life, vegetation, or property, or as to interfere with the

normal use and enjoyment of animal life, vegetation, or property.

06/27/2008 Date:

NO

(671461)

CN600866800

Classification Moderate

Classification

Classification:

Classification:

Classification:

Moderate

Moderate

Moderate

Self Report? Citation:

30 TAC Chapter 111, SubChapter A 111.111(a)(1)(E)

30 TAC Chapter 116, SubChapter G 116.715(a)

5C THSC Chapter 382 382,085(b)

No. 47256, Special Condition No. 38 PERMIT

Description:

Citation:

BP Products North America Texas City failed to prevent a malfunction of an air blower vent valve in the FCCU No. 1, electrostatic precipitator, resulting in an opacity of 86.30 percent

(%) for a duration of 12 minutes.

Date

07/02/2008 Self Report?

(683124)

30 TAC Chapter 111, SubChapter A 111.111(a)(1)(E)

30 TAC Chapter 116, SubChapter G 116.715(a)

5C THSC Chapter 382 382.085(b)

No. 47256, Special Condition No. 38 PERMIT

Description: BP failed to prevent a malfunction of the electrostatic precipitator in the FCCU No. 1,

resulting in an opacity of 68 percent (%) for a duration of 2 hours. 07/17/2008

Self Report?

CN600866800

Classification: Moderate

Classification:

Citation:

Date:

30 TAC Chapter 111, SubChapter A 111.111(a)(1)(E) 30 TAC Chapter 116, SubChapter G 116.715(a)

5C THSC Chapter 382 382,085(b)

No. 47256, Special Condition No. 38 PERMIT

Description: BP failed to prevent a power glitch in the electrostatic precipitator of FCCU No. 1.

Date:

07/17/2008

(686166)

CN600866800 Classification;

Moderate

Moderate

Self Report? Citation:

30 TAC Chapter 305, SubChapter F 305.125(1)

Description:

Failure to maintain compliance with the Outfall 001 permit limits for fecal coliform, Classification: Moderate

Self Report? Citation:

2D TWC Chapter 26, SubChapter A 26,121(a) 2D TWC Chapter 26, SubChapter A 26,121(a)(1) 2D TWC Chapter 26, SubChapter A 26.121(a)(3) 2D TWC Chapter 26, SubChapter A 26.121(b) 2D TWC Chapter 26, SubChapter A 26.121(c) 2D TWC Chapter 26, SubChapter A 26.121(d) 2D TWC Chapter 26, SubChapter A 26.121(e) 30 TAC Chapter 305, SubChapter F 305.125(4) 30 TAC Chapter 305, SubChapter F 305.125(5)

TWC Chapter 26 26,121

TWC Chapter 26 26,121(a)(2) Failure to prevent the unauthorized discharge of partially treated wastewater. Description:

Date: 08/19/2008

Self Report?

(688028)Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THSC Chapter 382 382.085(b)

Special Condition 2 PERMIT

(688278)

BP representatives failed to prevent tube erosion and leaks in the Overhead Fin Fan (C405-Description:

4-North).

Self Report?

Date:

08/26/2008

Classification:

Moderate

Citation:

30 TAC Chapter 116, SubChapter G 116,715(a)

47256 Special Condition 1 PERMIT 5C THSC Chapter 382 382,085(b)

Description:

Failure to ensure proper performance of the exchanger bundle prior to its

Self Report? Cilation:

NO

30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)

5C THSC Chapter 382 382,085(b)

Description:

Failure to submit the initial notification within 24 hours of the start of the incident.

08/27/2008 Date:

(681483)

30 TAC Chapter 122, SubChapter B 122.143(4)

Classification:

Classification:

Moderate

Moderate

Moderate

Minor

Citation:

Self Report?

40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-2(a)(2)

5C THSC Chapter 382 382.085(b)

FOP, Special Condition 1A OP

Description:

Failure to conduct weekly audio, visual and olfactory (AVO) inspections.

Self Report?

NO

Citation:

Classification:

30 TAC Chapter 117, SubChapter B 117.345(f)(10) 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b) FOP Special Condition 14A OP FOP Special Condition 1A OP

Description

Failure to use a run-time meter to record the stationary diesel engines' operating time.

Self Report? Citation:

Classification:

30 TAC Chapter 115, SubChapter D 115,352(4) 30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-6(a)(1)

5C THSC Chapter 382 382.085(b) FOP Special Condition 1A OP NSR Special Condition 17E PERMIT

Failure to equip open-ended lines (OELs) with a cap, plug, flange or second valve. Description:

Date:

09/02/2008

(610610)

CN600866800

Classification:

Minor

Self Report? Citation:

30 TAC Chapter 122, SubChapter B 122.143(4) 30 TAC Chapter 122, SubChapter B 122.145(2)(A)

5C THSC Chapter 382 382,085(b)

FOP 0-01541, General Terms & Conditions OP

Description: Self Report?

Citation:

NO

NO

Failure to include seven SSM events in the deviation reports.

Classification:

Classification:

30 TAC Chapter 115, SubChapter D 115,352(4) 30 TAC Chapter 115, SubChapter H 115,783(5) 30 TAC Chapter 116, SubChapter G 116,715(a) 30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-6(a)(1) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)

5C THSC Chapter 382 382,085(b)

FOP O-01541, Special Term & Condition 23 OP FOP O-01541, Special Term & Conditon 1A OP Permit 19599, Special Condition BE PERMIT Permit 2231, Special Condition 6E PERMIT Permit 47256, Special Condition 17E PERMIT Permit 6488, Special Condition 1E PERMIT Permit 9606, Special Condition 10E PERMIT

Description: Citation:

Failure to cap 81 open-ended valves/lines.

Self Report?

30 TAC Chapter 111, SubChapter A 111.111(a)(4)(A)(ii) 30 TAC Chapter 116, SubChapter G 116.715(a)

30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(1)

5C THSC Chapter 382 382.085(b)

FOP O-01541, Special Term & Condition 23 OP FOP O-01541, Special Term & Conditon 1A OP Permit 47256, Special Condition 14 PERMIT

Description:

Failure to operate Torch #1 (ID TCH-1) and the Alky 3 flare (EPN 530) without visible

emissions.

Self Report?

Classification:

Minor

Minor

Minor

Citation:

30 TAC Chapter 111, SubChapter A 111.111(a)(2)(C) 30 TAC Chapter 116, SubChapter G 116.715(a)

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

FOP 0-01541 Special Term & Condition 23 OP FOP 0-01541, Special Term & Condition 1A OP Permit 47256, Special Condition 64A PERMIT

Failure to continuously monitor for opacity on FCCU3 (ID FCU3) on May 3 and May 4,2007. Description:

Self Report? Citation:

Classification:

30 TAC Chapter 115, SubChapter B 115.142(1)(G)

30 TAC Chapter 116, SubChapter G 116.715(a) 30 TAC Chapter 122, SubChapter B 122,143(4) 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(b)(2)(i) 5C THSC Chapter 382 382.085(b) FOP O-01541, Special Term & Condition 1A OP FOP O-01541, Special Term & Condition 23 OP Permit 47256, Special Condition 3D PERMIT Description: Failure to maintain sealed covers on sewer junction boxes. Self Report? Classification; Minor Citation: 30 TAC Chapter 116, SubChapter G 116.715(a) 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.354(f)(1) 5C THSC Chapter 382 382,085(b) FOP O-01541, Special Term & Condition 1A OP FOP O-01541, Special Term & Condition 23 OP Permit 47256 Special Condition 3D PERMIT Description: Failure to perform monthly bypass-valve inspections for 15 carbon canisters, Self Report? Classification: Minor Citation: 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(2)(i)(C) 5C THSC Chapter 382 382.085(b) FOP O-01541 Special Term & Condition 23 OP FOP O-01541, Special Term & Condition 1A OP Permit 22107, Special Condition 5 PERMIT Description: Failure to operate the thermal oxidizer (EPN 293) with a temperature of 1400 degrees. Self Report? NO Classification: Minor Citation: 30 TAC Chapter 116, SubChapter G 116,715(a) 30 TAC Chapter 122, SubChapter B 122,143(4) 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.347(b) 5C THSC Chapter 382 382.085(b) FOP O-01541, Special Term & Condition 1A OP FOP O-01541, Special Term & Condition 23 OP Permit 47256, Special Condition 3D PERMIT Failure to perform quarterly visual inspections for the integrity of seals and gaskets on Description: refinery oil/water separators. Self Report? Classification: Minor Citation: 30 TAC Chapter 115, SubChapter B 115.142(1)(G) 30 TAC Chapter 116, SubChapter G 116.715(a) FOP O-01541, Special Term & Condition 1A OP FOP O-01541, Special Term & Condition 23 OP Permit 47256, Special Condition 3D PERMIT Description: Failure to operate the W01 & PS3B oil/water separators with closed hatches and vapor tight NO Classification: Self Report? Minor Citation: 30 TAC Chapter 116, SubChapter G 116.715(a) 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.354(d) 5C THSC Chapter 382 382 085(b) FOP O-01541, Special Term & Condition 1A OP FOP O-01541, Special Term & Condition 23 OP Permit 47256, Special Condition 3D PERMIT Description: Failure to perform routine carbon canister monitoring for three carbon canisters during the month of September 2007. Classification: Minor Self Report? 30 TAC Chapter 116, SubChapter B 116.115(c) Citation: 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(b)(4)(iv) 5C THSC Chapter 382 382.085(b) FOP O-01541, Special Term & Condition 1A OP FOP O-01541, Special Term & Condition 23 OP Permit 47256, Special Condition 3D PERMIT Failure to perform two quarterly visual inspections on exposed sewer lines that manage Description: benzene-contaminated waste. Classification: Self Report? NO Minor 30 TAC Chapter 116, SubChapter G 116.715(a) Citation: 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(b)(4)(iii) 5C THSC Chapter 382 382,085(b) FOP O-01541, Special Term & Condition 1A OP FOP O-01541, Special Term & Condition 23 OP Permit 47256, Special Condition 3D PERMIT Failure to perform 11 quarterly AVO inspections of manways/hatches on FCCU1, DDU, Description: Alkylation 3, FCCU3, & UU3. Self Report? NO Classification: Minor 30 TAC Chapter 116, SubChapter G 116,715(a) Citation: 30 TAC Chapter 122, SubChapter B 122,143(4) 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.343(c)

5C THSC Chapter 382 382.085(b) FOP O-01541, Special Term & Condition 1A OP FOP O-01541, Special Term & Condition 23 OP Permit 47256, Special Condition 3D PERMIT

Description: Failure to perform five quarterly visual inspections of tanks in benzene contaminated

wasiewater service.

NΩ Self Report? Citation:

30 TAC Chapter 116, SubChapter G 116.715(a)

30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60:18(f)(2)

5C THSC Chapter 382 382,085(b)

FOP O-01541, Special Term & Condition 1A OP FOP O-01541, Special Term & Condition 23 OP Permit 47256, Special Condition 14B PERMIT

Failure to perform pilot flame continuous monitoring for Torch RHU and Torch #5 due to Description:

weather related issues.

Self Report?

Classification: Minor

Classification:

Minor

Citation:

30 TAC Chapter 111, SubChapter A 111.111(a)(4)(A)(ii) 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

FOP O-01541, Special Term & Condition 1A OP

Description: Failure to perform 22 daily visual flare observations for the 108-FA flare, Torch 5, and CFHU

NO Self Report?

Classification:

Classification:

Minor

Minor

Citation:

30 TAC Chapter 115, SubChapter H 115,722(d) 30 TAC Chapter 116, SubChapter G 116.715(a) 30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(2) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.11(b)(5)

5C THSC Chapter 382 382.085(b)

FOP O-01541, Special Term & Cond. 1H(i) OP FOP Q-01641, Special Term & Condition 1A OP FOP O-01541, Special Term & Condition 23 OP Permit 47256, Special Condition 148 PERMIT

Failure to maintain the pilot flame on thermal oxidizer (EPN 293), Torch 1 (TCH-1), and Description:

Self Report?

Citation:

NO 30 TAC Chapter 115, SubChapter H 115.722(d)

30 TAC Chapter 116, SubChapter G 116.715(a)

30 TAC Chapter 122, SubChapter 8 122.143(4)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60,18(c)(3)(ii) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.11(b)(6)(ii)

5C THSC Chapter 382 382.085(b) FOP Q-01541, Special Term & Cond. 1H(i) OP

FOP O-01541, Special Term & Condition 1A OP FOP O-01541, Special Term & Condition 23 OP Permit 47256, Special Condition 14A PERMIT

Description: Failure to maintain the net heating value of 300 Btu/scf on Torch 3 & 6, CFHU flare, 108-FA

flare, & ULC flare,

Self Report? Citation:

Classification:

30 TAC Chapter 116, SubChapter G 116.715(a)

30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Part 60, Subpart A 60.18(c)(4)(i) 40 CFR Part 63, Subpart A 63,11(b)(7)(i) 5C THSC Chapter 382 382,085(b) FOP O-01541, Special Term & Condition 1A OP

FOP O-01541. Special Term & Condition 23 OP Permit 47256, Special Condition 14A PERMIT

Failure to operate the CFHU flare within the maximum exit velocity of 60 feet/second. Description:

Self Report?

Classification:

Classification:

Classification:

Minor

Minor

Citation:

30 TAC Chapter 116, SubChapter G 116.715(a) 30 TAC Chapter 122, SubChapter B 122:143(4) 5C THSC Chapter 382 382,085(b) FOP O-01541, Special Term & Condition 23 OP Permit 47256, Special Condition 31A PERMIT

Description:

Failure to perform AVO inspections of equipment, on the SRU, CFHU, and RHU once per

Self Report?

30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-10(f)(1)(ii)

5C THSC Chapter 382 382.085(b)

FOP O-01541, Special Term & Condition 1A OP

Failure to perform the annual visual inspection of the ARU closed vent system. Description: Self Report?

Citation:

Classification: Minor

Citation:

30 TAC Chapter 115, SubChapter H 115.781(c)(1) 30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-2(a)(2)

5C THSC Chapter 382 382,085(b)

FOP O-01541, Special Term & Condition 1A OP

Description: Self Report?

NΩ

Failure to perform weekly AVO inspections of pumps seals across the refinery.

Citation:

30 TAC Chapter 115, SubChapter D 115,354(3)

30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) FOP 0-01541, Special Term & Condition 1A OP Failure to perform 16 weekly AVO inspections of flanges on process units across the Description: Self Report? NO Classification: Minor 30 TAC Chapter 115, SubChapter D 115.354(2) Citation: 30 TAC Chapter 116, SubChapter G 116,715(a) 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(c)(1) 5C THSC Chapter 382 382.085(b) FOP 0-01541. Special Term & Condition 1A OP FOP O-01541, Special Term & Condition 23 OP Permit 47256, Special Condition 17F PERMIT Failure to perform Method 21 monitoring to 34 LDAR Components (ID REF-FUG) across Description: Self Report? NO Classification: Minor Citation; 30 TAC Chapter 115, SubChapter D 115.352(2) 30 TAC Chapter 116, SubChapter G 116,715(a) 30 TAC Chapter 122, SubChapter B 122,143(4) 5C THSC Chapter 382 382,085(b) FOP O-01541, Special Condition 23 OP FOP O-01541, Special Term & Condition 1A OP Permit 47256, Special Condition 18i PERMIT Description; Failure to make a first attempt of repair to six leaking components and one pump (ID REF-FUG) within 5/15 days. NO Self Report? Classification: Minor Citation: 30 TAC Chapter 115, SubChapter B 115,114(a)(2) 30 TAC Chapter 116, SubChapter G 116,715(a) 30 TAC Chapter 122, SubChapter 8 122.143(4) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.120(b)(8) 5C THSC Chapter 382 382 085(b) FOP O-01541, Special Term & Condition 1A OP FOP O-01541, Special Term & Condition 23 OP Permit 47256, Special Condition 5D PERMIT Description: Failure to repair gaps in seals on floating roof storage tanks 184, 1052, 1054, & 1046 within 45 calendar days. NO Self Report? Classification: Minor 30 TAC Chapter 115, SubChapter B 115.112(a)(2)(A) Citation: 30 TAC Chapter 122, SubChapter B 122,143(4) 40 CFR Part 63, Subpart G 63.119(c)(2)(vii) 40 CFR Part 63, Subpart G 63.119(c)(2)(xi) 5C THSC Chapter 382 382,085(b) FOP O-01541, Special Term & Condition 1A OP Description: Fallure to operate storage tanks in VOC service with the gauge/sampling hatches in the closed position. Self Report? NO Classification: Minor Citation: 30 TAC Chapter 115, SubChapter B 115.112(a)(2)(B) 30 TAC Chapter 122, SubChapter B 122,143(4) 5C THSC Chapter 382 382.085(b) FOP O-01541, Special Term & Condition 1A OP Description: Failure to operate floating roof storage tanks with automatic bleeder yents or rim yents in the closed position. Self Report? Classification: Minor Citation: 30 TAC Chapter 115, SubChapter B 115,112(d)(2)(H) 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63,119(c)(3) 5C THSC Chapter 382 382,085(b) FOP O-01541, Special Term & Condition 1A OP Description: Tank 187 Unauthorized tank landing on July 16, 2007, Self Report? Classification: Minor 30 TAC Chapter 116, SubChapter B 116.115(c) Citation: 30 TAC Chapter 122, SubChapter B 122,143(4) 5C THSC Chapter 382 382,085(b) FOP O-01541, Special Term & Condition 23 OP Permit 9606. Special Condition 4 PERMIT Description: Failure to continuously monitoring of the alkalinity of the caustic scrubber on Alky 3. Self Report? Classification: Moderate 30 TAC Chapter 115, SubChapter H 115.725(a)(1)(C) Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)

FOP O-01541, Special Term & Condition 1H OP Description: Failure to operate numerous heater/furnaces within O2 ranges pursuant to 30 TAC Subchapter H, Division 1. Self Report? Classification: Minor 30 TAC Chapter 115, SubChapter H 115.722(d)(1) Citation:

FOP 0-01541, Special Term & Condition 1H OP

30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382,085(b)

5C THSC Chapter 382 382.085(b)

Failure to operate three flares. Torches 2, 3, & 6 at or above the minimum net heating value Description:

Minor

Minor

Classification:

Classification:

Classification;

Classification:

Classification:

Minor

Minor

Minor

Moderate

of 300 Btu/scf.

Self Report? Classification: Cilation: 30 TAC Chapter 115, SubChapter H 115,725(d)(4)

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382 085(b) O-01541 Special Term & Condition 1H OP

Failure to perform manual sampling when the HRVOC analyzers for Torches 2, 4, 6, and Description:

108-FA were not operating

Self Report?

Citation:

Classification: 30 TAC Chapter 115, SubChapter H 115.725(a)(1)(C)

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382,085(b)

FOP O-01541, Special Term & Condition 1H OP

Failure to operate eight furnaces at a sufficient firing rate to consume oxygen for the control Description:

of HRVOC's from furnaces.

Self Report? NO

30 TAC Chapter 116, SubChapter B 116.115(c)

Citation:

30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382,085(b) FOP O-01541, Special Term & Condition 23 OP

Permit 6488, Special Condition 2 PERMIT

Failure to operate the B-401A, 8-405, and RDU B-401B furnace within the permitted Description:

emissions limits for CO on June 14, 2007.

Self Report?

Classification: Minor

30 TAC Chapter 116, SubChapter B 116.115(c) Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b) FOP O-01541, Special Term & Condition 23 OP

Permit 19599, Special Condition 1 PERMIT

Exceedances permitted CO limits on Pipestill furnaces 101-BA & BB, 103-BB, and 102-BA Description:

& BB furnaces.

Self Report?

Classification: Minor

30 TAC Chapter 116, SubChapter G 116.715(a) Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

FOP O-01541, Special Term & Condition 23 OP Permit 47256, Special Condition 35 PERMIT

Failure to operate the FCCU3 Regeneration System within the permitted emissions limits for Description:

NO

NO

Self Report? Citation:

30 TAC Chapter 122, SubChapter B 122,143(4)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT F 63.103(c)(2)

5C THSC Chapter 382 382.085(b)

FOP O-01541, Special Term & Condition 1A OP

Failure to maintain required records relating to two SSM events that occurred to the AU2 Description:

Self Report? Citation:

30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.104(a)(1)

5C THSC Chapter 382 382.085(b)

FOP O-01541, Special Term & Condition 1A OP Permit 47256, Special Condition 47 PERMIT

Failure to limit the amount of H2S in the refinery fuel gas system. Description:

Self Report?

30 TAC Chapter 115, SubChapter B 115.112(a)(2)(C)

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Part 63, Subpart G 63.119(c)(2)(iv)

5C THSC Chapter 382 382.085(b)

FOP O-01541, Special Term & Condition 1A OP

Description: Operating Tank 93 with an open rim vent during normal operation.

09/30/2008 Date:

(710590)

CN600866800

Classification: Moderate

Self Report? Citation:

Description:

2D TWC Chapter 26, SubChapter A 26.121(a) 30 TAC Chapter 305, SubChapter F 305.125(1)

Description: Failure to meet the limit for one or more permit paramete

11/03/2008 (701072)

Self Report?

30 TAC Chapter 116, SubChapter G 116.715(a) Citation: 47256, Special Condition 1, PERMIT

> 5C THSC Chapter 382 382.085(b) Fallure to prevent unauthorized emissions.

11/03/2008 (688276) Date:

Classification: Moderate Self Report?

30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B) Citation;

5C THSC Chapter 382 382.085(b)

Failure to submit the initial notification within 24 hours of the start of the incident. Description: Classification: Moderate Self Report?

Citation: 30 TAC Chapter 116, SubChapter G 116,715(a) 47256, Special Condition 1 PERMIT

5C THSC Chapter 382 382.085(b)

Failure to follow proper operational practices while placing D Sulfur Train in service. Description:

11/07/2008

(700788) Self Report?

30 TAC Chapter 116, SubChapter B 116.115(a) Citation:

5C THSC Chapter 382 382,085(b)

Special Condition No. 38 PERMIT

Description:

Failure to prevent the tripping of the Electrostatic Precipitator (ESP) that resulted in excess

opacity.

11/21/2008 Date:

(706756)

CN600866800

Classification:

Classification:

Moderate

Moderate

Moderate

Minor

Moderate

Moderate

Classification:

Self Report? Citation:

30 TAC Chapter 116, SubChapter G 116.715(a)

5C THSC Chapter 382 382,085(b)

S.C 1 PERMIT

Description: Failure to meet the affirmative defense for Incident #111204 regarding the Sulfur Recovery

Unit.

12/05/2008 (684893)

Self Report?

Citation

Classification: 30 TAC Chapter 101, SubChapter F 101.223(a)(2)

5C THSC Chapter 382 382,085(b)

Failure to implement the CAP in accordance with the approved schedule, specifically, the Description:

RE failed to install a flow meter by October 2007.

12/12/2008 (707738) Date:

Self Report?

Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter G 116.715(a)

5C THSC Chapter 382 382.085(b) Special Condition 38 PERMIT

Failure to prevent excessive opacity. Description: (689327)

12/15/2008 Date:

Self Report? Classification: Minor

Citation:

30 TAC Chapter 117, SubChapter B 117.345(c) 30 TAC Chapter 117, SubChapter H 117,9020(2)(C)(i)

Failed to conduct stack test by the required deadline. Failed to submit report in the required Description:

timeframe,

12/18/2008 (709251)

Self Report? Classification:

30 TAC Chapter 101, SubChapter F 101,223(a)(1) Citation

5C THSC Chapter 382 382.085(b)

Description: BP Products failed to submit the CAP in a timely manner

(710591)Date: 12/31/2008

Self Report? Classification: Moderate

2D TWC Chapter 26, SubChapter A 26.121(a) Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)

Failure to meet the limit for one or more permit parameter Description:

01/30/2009 (723946) CN600866800 Date:

Classification: Self Report?

Citation: 30 TAC Chapter 116, SubChapter G 116.715(a)

> 5C THSC Chapter 382 382.085(b) Special Condition No. 38 PERMIT

BP failed to maintain the charge rate to the north riser and the lower slide valve of the Description:

Electrostatic Precipitator (ESP), resulting in an opacity of 57% (684626) Date: 02/26/2009 CN600866800

Self Report?

30 TAC Chapter 116, SubChapter G 116.715(a) 5C THSC Chapter 382 382.085(b)

No. 47256, Special Condition No. 1 PERMIT

BP failed to maintain the level transmitters, level controllers and motor operated valves, Description:

resulting a release of 5 pounds (lbs.) of butane, 235 lbs. of carbon monoxide, 9 lbs. of hexane, 9 lbs. of hydrogen sulfide, 2 lbs. of isobutane, 46 lbs. of nitrogen oxide, 5 lbs. of

propane, and 793 lbs, of sulfur dioxide.

03/12/2009 (726767)Dale:

Citation:

Self Report? Classification: Moderate

30 TAC Chapter 116, SubChapter G 116.715(a) Citation: 5C THSC Chapter 382 382.085(b) No. 47256, Special Condition No. 1 PERMIT

BP failed to prevent a surge of process gas from the T-2 tower on the utilities Power 2 Unit, Description:

triggering an upset of the SRU.

03/12/2009 Date:

Classification: Moderate Self Report?

Citation: 30 TAC Chapter 116, SubChapter G 116.715(a) 5C THSC Chapter 382 382.085(b)

No. 47256, Special Condition No. 1 PERMIT

BP failed to prevent the maifunction of a relief valve on tank 135, resulting in release of Description:

1,701 lbs. of unauthorized volatile organic compounds.

Date: 03/20/2009

Classification: Minor Self Report?

30 TAC Chapter 101, SubChapter F 101.223(a)(1) Citation:

5C THSC Chapter 382 382.085(b)

BP Products failed to submit an Initial CAP in a timely manner, Description

04/02/2009 (738251)

Self Report? Classification: Moderate

30 TAC Chapter 116, SubChapter G 116,715(a) Citation 5C THSC Chapter 382 382,085(b)

Flexible Permit No. 47256, SC #1 PERMIT

BP failed to prevent a small flare flow increase from the FCCU3 process line to Flare 3 due Description.

to a bad spring on a relief valve.

04/17/2009 (741327) Date:

Citation:

Self Report? Classification: Moderate 30 TAC Chapter 116, SubChapter G 116.715(a)

5C THSC Chapter 382 382,085(b)

TCEQ Flexible Permit No. 47256, SC #1 PERMIT

BP failed to prevent a spill valve from opening prematurely Description

(743562) Date: 05/14/2009

Self Report? Classification: Moderate

30 TAC Chapter 116, SubChapter G 116,715(a) Citation:

5C THSC Chapter 382 382.085(b)

TCEQ Flexible Permit No. 47256, SC #1 PERMIT

Failure to prevent unauthorized emissions; specifically, BP failed to prevent a tube leak in Description:

Moderate

Moderate

Minor

Classification:

Classification:

the 512C1A cooling exchanger.

Date 05/31/2009 (804320) CN600866800

Classification: Self Report? YES

2D TWC Chapter 26, SubChapter A 26,121(a) Citation: 30 TAC Chapter 305, SubChapter F 305,125(1)

Description Failure to meet the limit for one or more permit parameter (750123) Date; 06/30/2009 CN600866800

Self Report? Classification:

Moderate 2D TWC Chapter 26, SubChapter A 26.121(a) Cilation

30 TAC Chapter 305, SubChapter F 305.125(1) Failure to meet the limit for one or more permit parameter Description: (762640) 08/07/2009

Date: CN600866800 Self Report? Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter G 116.715(a)

5C THSC Chapter 382 382,085(b)

TCEQ Flexible Permit No. 47256, SC #1 PERMIT

Description: BP failed to prevent a high liquid level in the KO pol.

NO Self Report? Citation:

30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B) Description BP failed to submit the initial notification within the 24 hours after discovery of the event.

Date: 08/17/2009 (762557) Classification: Moderate

Self Report? NO 30 TAC Chapter 116, SubChapter G 116,715(a) Citation:

5C THSC Chapter 382 382.085(b)

TCEQ Flexible Permit No. 47256. SC #1 PERMIT

BP falled to prevent a spike in the reactor pressure, Description:

(749791) Self Report?

30 TAC Chapter 115, SubChapter F 115.541(a)(1)(B) Citation: 5C THSC Chapter 382 382,085(b)

Failure to demonstrate a 90% DRE for the tank degassing activities associated with Tank Description:

30 and Tank 1044.

09/04/2009

Date:

Classification: Minor

Self Report? NO Citation:

30 TAC Chapter 115, SubChapter F 115.542(a)(6)

30 TAC Chapter 115, SubChapter F 115.546(1)(D)

5C THSC Chapter 382 382,085(b) Description:

Failure to monitor the VOC concentration in tanks 30 and 1044 every 12 hours until 5 consecutive readings are less than 34,000 ppmvd or 50% LEL after tank degassing

operations cease.

10/23/2009 (774941)

Self Report? Classification: Moderate

30 TAC Chapter 116, SubChapter G 116,715(a) Citation: 5C THSC Chapter 382 382.085(b)

TCEQ Flexible Permit No. 47256, SC #1 PERMIT

8P failed to prevent a shut down in the south riser system.

Description: (779383) Date 11/05/2009

Self Report?

Classification:

30 TAC Chapter 116, SubChapter G 116.715(a) Citation: 5C THSC Chapter 382 382,085(b)

TCEQ Flexible Permit No. 47256, SC #1 PERMIT

Description: BP failed to prevent a compressor failure which resulted in the releasing of unauthorized

emissions to the atmosphere.

11/18/2009 (780596) Date:

Self Report? Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter G 116.715(a)

5C THSC Chapter 382 382,085(b)

TCEQ Flexible Permit No. 47256, SC #1 PERMIT

Description: BP failed to prevent two gas turbines/duct burners from tripping due to a plugged filter.

Date: 11/30/2009

(804325) CN600866800

Self Report? YES Classification: Moderate

Citation: 2D TWC Chapter 26, SubChapter A 26.121(a) 30 TAC Chapter 305, SubChapter F 305,125(1)

Description: Failure to meet the limit for one or more permit parameter

Date: 02/05/2010 (788221)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter G 116,715(a)

5C THSC Chapter 382 382.085(b)

TCEQ Flexible Permit No. 47256, SC #1 PERMIT TCEQ Flexible Permit No. 47256, SC #38 PERMIT

Description: BP failed to prevent a build-up of dirt and debris inside the electrical box, resulting in the

shut down of the FCCU 1 J-4 Lift Blower.

Date: 02/26/2010 (790571)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(1)(B)

30 TAC Chapter 116, SubChapter G 116.715(a)
5C THSC Chapter 382 382.085(b)
TCEQ Flexible Permit No. 47256, SC #1 PERMIT
TCEQ Flexible Permit No. 47256, SC #38 PERMIT

Description; BP failed to prevent an upset in the FCCU 1 due to a loss of differential pressure on the

standpipe aeration.

Date: 02/28/2010 (830754) CN600866800

Self Report? YES Classification: Moderate

Citation: 2D TWC Chapter 26, SubChapter A 26.121(a) 30 TAC Chapter 305, SubChapter F 305.125(1)

Description: Failure to meet the limit for one or more permit parameter

Date: 04/09/2010 (792366)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.4

5C THSC Chapter 382 382,085(b)

Description: Failure to comply with 30 TAC 101.4. BP Products North America created a "nuisance"

condition by a release of catalyst fines.

Date: 04/16/2010 (797555)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 111, SubChapter A 111,111(a)(1)(B)

30 TAC Chapter 116, SubChapter G 116,715(a) 5C THSC Chapter 382 382,085(b) TCEQ Flexible Permit No. 47256, SC #1 PERMIT TCEQ Flexible Permit No. 47256, SC #38 PERMIT

Description: BP failed to prevent corrosion of a rack arm assembly caused by extended exposure to

water.

Date: 06/08/2010 (802689) CN600866800

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter G 116,715(a)

5C THSC Chapter 382 382.085(a) Special Condition 1 PERMIT

Description: Failed to prevent unauthorized emissions which resulted from the FCCU 1 from a tripping.

F. Environmental audits.

Notice of Intent Date: 08/11/2005 (434113) Disclosure Date: 11/21/2005

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter F 115.546

Description: Failure to have records readily available at the facility as required.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter F 115,543

30 TAC Chapter 115, SubChapter F 115.546(2)

Description: Failure to determine whether combustion engines used by a contractor of BP would be considered approved "vapor

control systems" under rule or are subject to an alternative control method.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 106, SubChapter K 106.264(7)

Description: Failure, per permit by rule, to submit notice tot he Executive Director within 10 days following the installation of a

replacement facility.

Viol. Classification: Mina

Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT K 60.110(a)

Description: Failure to retain records relating to the installation of floating roof for tank numbers 67, 72, 1024 and 1041.

Viol. Classification: Major

Citation: 30 TAC Chapter 106, SubChapter A 106,4

30 TAC Chapter 116, SubChapter B 116.110

30 TAC Chapter 116; SubChapter B 116,119(a)(1)

Description: Failure to submit to TCEQ for authorization to operate a temporary for degassing operations.

(679898)

(531596)

Notice of Intent Date:

02/23/2006 (458564)

No DOV Associated

Notice of Intent Date:

07/06/2006

No DOV Associated

Notice of Intent Date:

10/06/2006

Disclosure Date:

10/09/2007

Viol Classification:

Moderate

Citation:

30 TAC Chapter 113, SubChapter C 113.340

Ramt Prov:

PERMIT NSR Permit 19559

Description:

Failure to monitor PS3A crude lines that may be considered to be in light liquid service were not monitored in accordance

with 40 CFR Part 60, Subparts A and VV.

Viol. Classification:

Moderale

Citation:

30 TAC Chapter 122, SubChapter B 122.145(2)

30 TAC Chapter 122, SubChapter B 122.146

Description:

Failure to include violations associated with disclosures presented in items 1 and 3 of the October 09, 2007 disclosure

letter in the Title V deviation report or the compliance certification for the applicable time period.

Viol. Classification:

Moderate

Gitation:

30 TAC Chapter 115, SubChapter H 115.782(c)

30 TAC Chapter 122, SubChapter B 122.143(4)

Romt Prov:

PERMIT 0-01541

Description:

Failure to submit the report required by 30 TAC 115.786(c) for non-repairable HRVOC components for the semi-annual

periods taht relate to the July 31, 2005, January 31, 2006 and July 31, 2006 report dates.

Notice of Intent Date;

01/08/2007

(543500)

Disclosure Date:

02/15/2007

Viol. Classification:

Moderate 30 TAC Chapter 305, SubChapter F 305,125(1)

Citation: Description:

Failure to report accurate sampling results in several Discharge Monitoring Reports.

Viol. Classification:

Moderate

Citation:

30 TAC Chapter 305, SubChapter F 305.125(1)

Ramt Prov:

PERMIT TPDES 00443

Description:

Failure to use all dissolved oxygen measurements to determine and report the daily average and maximum values in

DMRS.

Viol. Classification:

Moderate 30 TAC Chapter 305, SubChapter F 305.125(1)

Citation:

PERMIT TPDES 00443

Description:

Rgmt Prov:

Failure to perform zinc analyses at the Method Analytical Limit (MAL) as low as required by permit.

Disclosure Date: Viol. Classification:

01/09/2008 Moderate

Citation:

40 CFR Chapter 136, SubChapter D, PT 136 136.3(e)

30 TAC Chapter 305, SubChapter F 305.125(1)

Ramt Prov:

PERMIT TPDES 00443

Description:

Failure to initiate refinery outfall 001 biomonitoring analysis within 36-hours of the collection time of the final composite

Moderate

Viol. Classification: Citation:

30 TAC Chapter 305, SubChapter F 305.125(1)

30 TAC Chapter 319, SubChapter A 319.6 30 TAC Chapter 319, SubChapter A 319.9(c)

Romt Prov:

HWPERMTCP TPDES 0443

Description:

Failure to collect and analyze duplicate dissolved oxygen samples each day a sample was collected.

Viol. Classification:

Citation:

30 TAC Chapter 305, SubChapter F 305.125(1)

30 TAC Chapter 319, SubChapter A 319.6 30 TAC Chapter 319, SubChapter A 319,9(c)

Ramt Prov:

PERMIT TPDES 00443

Description:

Failure to maintain records of the date/time of sampling and analysis and thename of the person performing the analysis

for pH samples at Refinery Outfall 001.

Viol. Classification:

Minor

30 TAC Chapter 305, SubChapter F 305.125(1)

Citation: Romt Prov:

PERMIT TPDES 00443

Description:

Failure to maintain documentation to demonstrate that the receiving water was unacceptable for bimonitoring testing and

that synthetic dilution water was an acceptable alternative.

Notice of Intent Date: No DOV Associated 01/08/2007

(543522)

Notice of Intent Date:

01/15/2007

(543479)

No DOV Associated		
Notice of Intent Date: No DOV Associated	01/15/2007	(543483)
Notice of Intent Date: No DOV Associated	02/27/2007	(554846)
Notice of Intent Date: No DOV Associated	05/14/2007	(563478)
Notice of Intent Date; No DOV Associated	05/23/2007	(563481)
Notice of Intent Date; No DOV Associated	05/23/2007	(563537)
Notice of Intent Date: No DOV Associated	05/23/2007	(563568)
Notice of Intent Date: No DOV Associated	05/23/2007	(563575)
Notice of Intent Date;	05/23/2007	(563584)
No DOV Associated		
Notice of Intent Date: No DOV Associated	05/23/2007	(563639)
Notice of Intent Date; No DOV Associated	05/23/2007	(563643)
Notice of Intent Date: No DOV Associated	05/25/2007	(563649)
Notice of Intent Date: No DOV Associated	06/08/2007	(565946)
Notice of Intent Date: No DOV Associated	06/04/2007	(571646)
Notice of Intent Date: No DOV Associated	08/08/2007	(593445)
Notice of Intent Date: Disclosure Date:	09/10/2007 09/11/20	(596466) 08
Visit Olassifications	44 - de 5 -	

Viol. Classification:

Moderate

Citation:

30 TAC Chapter 205, SubChapter A 205.2

Description;

Failure to sign and/or implement a Storm Water Poliution and Prevention Plan at the Mowtown/Merville area until

10/01/2007, five months after the actual time required by the TPDES permit.

Viol. Classification:

Citation:

30 TAC Chapter 205, SubChapter A 205.2(a)(5)(A)

Description:

Failure to maintain records of inspections of controls in disturbed areas and associated maintenance controls during

construction of the Employee Services Building (ESB). 09/11/2007 (596501)

Notice of Intent Date:

No DOV Associated

09/25/2007

Notice of Intent Date: No DOV Associated

(618188)

Notice of Intent Date:

10/05/2007

(618157)

Disclosure Date:

04/29/2008

Viol. Classification:

Moderate

Citation:

30 TAC Chapter 101, SubChapter A 101.20(2)

30 TAC Chapter 113, SubChapter C 113,100 30 TAC Chapter 113, SubChapter C 113,300 30 TAC Chapter 113, SubChapter C 113.340 30 TAC Chapter 116, SubChapter G 116.715(a)

40 CFR Chapter 61, SubChapter C, PT 61, SubPT BB 61.305(a) 40 CFR Chapter 61, SubChapter C, PT 61, SubPT BB 61.305(a)(5) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT Y 63.567(f)

40 CFR Part 63, Subpart CC 63.654(i)(2)

Rgmt Prov:

PERMIT Federal Operating Permit O-2328

PERMIT Flexible Permit 47256

Description:

Failure to maintain records. Specifically, BP is unable to locate quarterly and annual reports for the Part 61 Subpart BB and Part 63 Subpart Y marine loading regulatory programs for the period 2004-2007. In addition, BP is unable to locate recent stack performance test reports for the Refinery Marine Dock thermal oxidizers.

Viol. Classification:

Moderate

Citation:

30 TAC Chapter 115, SubChapter H 115,764(a)(6)

30 TAC Chapter 122, SubChapter B 122.143(4)

Rgmt Prov:

PERMIT Federal Operating Permit O-1541

Description:

Failure to perform sampling when the VOC continuous monitoring system at the FCCU 3 cooling tower was out of order

for periods of 24 hours or more on the following dates: March 12, June 14, June 19 and June 20, 2007.

Viol. Classification:

Citation:

30 TAC Chapter 101, SubChapter A 101.20(2)

30 TAC Chapter 113, SubChapter C 113,300

30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 61, SubChapter C, PT 61, SubPT BB 61.305(a) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT Y 63.562(e)(2)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT Y 63.567(f)

Rgmi Prov:

PERMIT Federal Operating Permit 0-02328

Description:

Failure to submit an engineering report which describes the vent system used to vent each affected vent stream to a control device. In addition, the Operations and Maintenance Plan for the refinery docks did not include "procedures (preventive maintenance) to be followed to ensure that pollution control equipment functions properly and valances of the control equipment and monitoring equipment are minimal".

Viol. Classification:

Moderate

Citation

30 TAC Chapter 101, SubChapter A 101.20(2)

30 TAC Chapter 113, SubChapter C 113,300 30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT Y 63.564(e)

Ramt Prov:

PERMIT Federal Operating Permit 0-02328

Description:

Failure to verify the accuracy of the temperature monitor of the marine loading thermal exidizers on an annual basis with a reference temperature monitor or an independent temperature measurement device dedicated for this purpose. Instead,

the output of the temperature indicator was checked annually with a reference voltmeter.

Viol. Classification:

Moderate

Citation:

30 TAC Chapter 115, SubChapter C 115.222

Description:

The temporary gasoline tank at the refinery garage did not comply with certain vapor balance system control requirements

as specified in 30 TAC 115.222.

Viol. Classification:

Moderate

Citation:

30 TAC Chapter 115, SubChapter C 115.226(1)

30 TAC Chapter 115, SubChapter C 115.244(3) 30 TAC Chapter 115, SubChapter C 115,246(3) 30 TAC Chapter 115, SubChapter C 115.246(6) 30 TAC Chapter 122, SubChapter B 122.143(4)

Romt Prov:

PERMIT Federal Operating Permit 0-01541

Description:

Failure to maintain records for the daily, monthly and annual inspections of the temporary gasoline tank. Records of fuel delivery to the tank did not include the truck vapor tightness certificatin number and date. Maintenance records of the Stage II vapor control equipment were not located onsite, but were kept by the equipment vendor.

Viol. Classification:

Minor

Citation:

Rgmt Prov:

30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 116, SubChapter G 116.715(a) 30 TAC Chapter 122, SubChapter B 122.143(4) PERMIT Federal Operating Permit O-01541

PERMIT Flexible Permit 47256

PERMIT NSR Permit 20850

Description:

Failure to follow appropriate sampling method. The PRS3 (EPN 416) cooling tower HRVOC vertical sampling point was on the bottom of the horizontal return line, as opposed to the top of the horizontal section as suggested by Section 5 of the Appendix P sampling method. The Alky3 debutanizer cooling tower sample point was on the bottom of the horizontal return line, as opposed to on the top of the horizontal section, as suggested by Section 5 of the Appendix P sampling

method.

Notice of Intent Date; No DOV Associated	10/05/2007	(618172)
Notice of Intent Date: No DOV Associated	10/05/2007	(775276)
Notice of Intent Date: No DOV Associated	02/11/2008	(639339)
Notice of Intent Date: No DOV Associated	02/11/2008	(639343)
Notice of Intent Date: No DOV Associated	02/11/2008	(639356)
Notice of Intent Date: No DOV Associated	02/13/2008	(639357)
Notice of Intent Date: No DOV Associated	03/12/2008	(646267)
Notice of Intent Date; No DOV Associated	03/20/2008	(654986)
Notice of Intent Date: No DOV Associated	03/02/2010	(798036)

Type of environmental management systems (EMSs).

N/A

H. Voluntary on-site compliance assessment dates.

Participation in a voluntary pollution reduction program.

N/A

J. Early compliance.

N/A

Sites Outside of Texas

N/A

		,
		;

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



IN THE MATTER OF AN	8	BEFORE THE
ENFORCEMENT ACTION	§	
CONCERNING	§	TEXAS COMMISSION ON
BP PRODUCTS NORTH	§	
AMERICA INC.	§	
RN102535077	Š	ENVIRONMENTAL QUALITY

AGREED ORDER DOCKET NO. 2010-1527-IWD-E

At its ______ agenda, the Texas Commission on Environmental Quality ("the Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding BP Products North America Inc. ("the Respondent") under the authority of Tex. Water Code chs. 7 and 26. The Executive Director of the TCEQ, through the Enforcement Division, and the Respondent presented this agreement to the Commission.

The Respondent understands that it has certain procedural rights at certain points in the enforcement process, including, but not limited to, the right to formal notice of violations, notice of an evidentiary hearing, the right to an evidentiary hearing, and a right to appeal. By entering into this Agreed Order, the Respondent agrees to waive all notice and procedural rights.

It is further understood and agreed that this Order represents the complete and fully-integrated settlement of the parties. The provisions of this Agreed Order are deemed severable and, if a court of competent jurisdiction or other appropriate authority deems any provision of this Agreed Order unenforceable, the remaining provisions shall be valid and enforceable. The duties and responsibilities imposed by this Agreed Order are binding upon the Respondent.

The Commission makes the following Findings of Fact and Conclusions of Law:

I. FINDINGS OF FACT

1. The Respondent owns and operates a petroleum refinery with an associated wastewater treatment facility located at 2401 Fifth Avenue South between 21st and 25th in Texas City, Galveston County, Texas (the "Facility").

- 2. The Respondent has discharged industrial waste into or adjacent to any water in the state under Tex. Water Code ch. 26.
- 3. During an investigation conducted on March 17, 2010, and March 24, 2010, TCEQ staff documented that on February 16, 2010, during dewatering of a storage tank, approximately 5,466 pounds of toluene mixed with wastewater was released to the wastewater treatment plant; and from February 16, 2010, through February 18, 2010, approximately 24.31 million gallons of partially treated wastewater mixed with toluene was discharged through Outfall 005, killing approximately 33 fish. This discharge also resulted in exceedances of the total recoverable phenolics daily average loading and daily maximum loading limits of 24 pounds per day ("lbs/day") and 56 lbs/day, respectively, for the monitoring period ending February 28, 2010 (37.869 lbs/day and 409.024 lbs/day, respectively).
- 4. During an investigation conducted on March 17, 2010, and March 24, 2010, TCEQ staff documented that on January 27, 2010, a leak in the biosludge pipeline discharged approximately 750 gallons of nonhazardous biosludge into Borrow Ditch.
- 5. During a record review on October 11, 2010, TCEQ staff documented the following from the self-reported monthly discharge monitoring reports:
 - a. The fecal coliform daily maximum exceeded the permit limit of 400 colony forming units per 100 milliliters ("cfu/100mL") for the monitoring period ending November 30, 2009 (1,800 cfu/100mL);
 - b. The fecal coliform daily maximum exceeded the permit limit of 400 cfu/100mL for the monitoring period ending May 31, 2009 (5,700 cfu/100mL); and
 - c. The oil and grease daily maximum exceeded the permit limit of 2,520 pounds per day ("lbs/day") for the monitoring period ending June 30, 2009, (5,370 lbs/day) and the total recoverable phenolics daily average and daily maximum exceeded the permit limits of 24 lbs/day and 56 lbs/day, respectively, for the monitoring period ending June 30, 2009 (28.3 lbs/day and 80.6 lbs/day, respectively).
- 6. The Respondent received notice of the violations on June 24, 2010.
- 7. The Executive Director recognizes that the Respondent has implemented the following corrective measures at the Facility:
 - a. By January 27, 2010, ceased the unauthorized discharge of nonhazardous biosludge into Borrow Ditch;
 - b. By February 18, 2010, ceased the unauthorized discharge of wastewater mixed with toluene;

- c. By February 20, 2010, removed and disposed of the dead fish, collected and analyzed samples from the area affected by the February 16, 2010, discharge, and confirmed that pollutant levels in the hurricane canal had been reduced to levels protective of the environment;
- d. By March 18, 2010, completed the removal of the nonhazardous biosludge from Borrow Ditch;
- e. By March 31, 2010, investigated the cause of noncompliance and returned to compliance with all permitted effluent limits; and
- f. By October 12, 2010, updated operational procedures to prevent future unauthorized discharges.

II. CONCLUSIONS OF LAW

- 1. The Respondent is subject to the jurisdiction of the TCEQ pursuant to TEX. WATER CODE chs. 7 and 26 and the rules of the Commission.
- 2. As evidenced by Findings of Fact No. 3, the Respondent failed to prevent the unauthorized discharge of a nonpermitted wastewater source through Outfall 005 and failed to comply with permitted effluent limits, in violation of Tex. Water Code § 26.121(a)(1), 30 Tex. Admin. Code § 305.125(1), and Texas Pollutant Discharge Elimination System ("TPDES") Permit No. WQ0000443000, Effluent Limitations and Monitoring Requirements No. 1.
- 3. As evidenced by Findings of Fact No. 4, the Respondent failed to prevent the unauthorized discharge of industrial waste into or adjacent to water in the state, in violation of Tex. Water Code § 26.121(a)(1) and TPDES Permit No. 0000443000, Permit Conditions No. 2.g.
- 4. As evidenced by Findings of Fact No. 5, the Respondent failed to comply with permitted effluent limits for Outfall Nos. 001, 005 and 006, in violation of Tex. WATER CODE § 26.121(a)(1), 30 Tex. ADMIN. CODE § 305.125(1), and TPDES Permit No. WQ0000443000, Effluent Limitations and Monitoring Requirements No. 1.
- 5. Pursuant to Tex. Water Code § 7.051, the Commission has the authority to assess an administrative penalty against the Respondent for violations of the Texas Water Code and the Texas Health and Safety Code within the Commission's jurisdiction; for violations of rules adopted under such statutes; or for violations of orders or permits issued under such statutes.
- 6. An administrative penalty in the amount of Two Hundred Forty-Two Thousand Nine Hundred Dollars (\$242,900) is justified by the facts recited in this Agreed Order, and considered in light of the factors set forth in Tex. Water Code § 7.053. The Respondent

BP Products North America Inc. DOCKET NO. 2010-1527-IWD-E Page 4

has paid the Two Hundred Forty-Two Thousand Nine Hundred Dollar (\$242,900) administrative penalty.

III. ORDERING PROVISIONS

NOW, THEREFORE, THE TEXAS COMMISSION ON ENVIRONMENTAL QUALITY ORDERS that:

1. The Respondent is assessed an administrative penalty in the amount of Two Hundred Forty-Two Thousand Nine Hundred Dollars (\$242,900) as set forth in Section II, Paragraph 6 above, for violations of TCEQ rules and state statutes. The payment of this administrative penalty and the Respondent's compliance with all the terms and conditions set forth in this Agreed Order completely resolve the violations set forth by this Agreed Order in this action. However, the Commission shall not be constrained in any manner from requiring corrective actions or penalties for other violations that are not raised here. Administrative penalty payments shall be made payable to "TCEQ" and shall be sent with the notation "Re: BP Products North America Inc., Docket No. 2010-1527-IWD-E" to:

Financial Administration Division, Revenues Section Attention: Cashier's Office, MC 214 Texas Commission on Environmental Quality P.O. Box 13088 Austin, Texas 78711-3088

- 2. The provisions of this Agreed Order shall apply to and be binding upon the Respondent. The Respondent is ordered to give notice of the Agreed Order to personnel who maintain day-to-day control over the Facility operations referenced in this Agreed Order.
- 3. The Executive Director may refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings without notice to the Respondent if the Executive Director determines that the Respondent has not complied with one or more of the terms or conditions in this Agreed Order.
- 4. This Agreed Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Agreed Order, whichever is later.
- 5. This Agreed Order, issued by the Commission, shall not be admissible against the Respondent in a civil proceeding, unless the proceeding is brought by the OAG to: (1) enforce the terms of this Agreed Order; or (2) pursue violations of a statute within the Commission's jurisdiction, or of a rule adopted or an order or permit issued by the Commission under such a statute.
- 6. This Agreed Order may be executed in separate and multiple counterparts, which together shall constitute a single instrument. Any page of this Agreed Order may be

BP Products North America Inc. DOCKET NO. 2010-1527-IWD-E Page 5

copied, scanned, digitized, converted to electronic portable document format ("pdf"), or otherwise reproduced and may be transmitted by digital or electronic transmission, including but not limited to facsimile transmission and electronic mail. Any signature affixed to this Agreed Order shall constitute an original signature for all purposes and may be used, filed, substituted, or issued for any purpose for which an original signature could be used. The term "signature" shall include manual signatures and true and accurate reproductions of manual signatures created, executed, endorsed, adopted, or authorized by the person or persons to whom the signatures are attributable. Signatures may be copied or reproduced digitally, electronically, by photocopying, engraving, imprinting, lithographing, electronic mail, facsimile transmission, stamping, or any other means or process which the Executive Director deems acceptable. In this paragraph exclusively, the terms "electronic transmission", "owner", "person", "writing", and "written" shall have the meanings assigned to them under Tex. Bus. Org. Code § 1,002.

7. The Chief Clerk shall provide a copy of this Agreed Order to each of the parties. By law, the effective date of this Agreed Order is the third day after the mailing date, as provided by 30 Tex. Admin. Code § 70.10(b) and Tex. Gov't Code § 2001.142.

BP Products North America Inc. DOCKET NO. 2010-1527-IWD-E Page 6

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission	
For the Executive Director	2 23 20) Date
Products North America Inc. I am authorized t BP Products North America Inc., and do agree	I the attached Agreed Order in the matter of BP to agree to the attached Agreed Order on behalf of to the specified terms and conditions. I further ment for the penalty amount, is materially relying
certain procedural rights, including, but not li addressed by this Agreed Order, notice of an hearing, and the right to appeal. I agree to	d Order, BP Products North America Inc. waives imited to, the right to formal notice of violations evidentiary hearing, the right to an evidentiary of the terms of the Agreed Order in lieu of an constitutes full and final adjudication by the greed Order.
 and/or failure to timely pay the penalty amount A negative impact on compliance history Greater scrutiny of any permit application Referral of this case to the Attorney additional penalties, and/or attorney feed increased penalties in any future enforced Automatic referral to the Attorney General TCEQ seeking other relief as authorized 	ons submitted; General's Office for contempt, injunctive relief, es, or to a collection agency; cement actions; neral's Office of any future enforcement actions;
Signature Signature	<u>/2/16/10</u> Date
Name (Printed or typed) Authorized Representative of BP Products North America Inc.	Title Susances Must Conder

Instructions: Send the original, signed Agreed Order with penalty payment to the Financial Administration Division, Revenues Section at the address in Section III, Paragraph 1 of this Agreed Order.